Cl

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
COMPLIANCE AND ENFORCEMENT

APR 14 2011

Reply To: OCE-133

CERTIFIED MAIL – 7008 0150 0000 8075 9985
RETURN RECEIPT REQUESTED

WARNING LETTER

Ed Armstrong, Ferrous/Maintenance Manager
Seattle Iron & Metals Corp.
601 South Myrtle Street
Seattle, Washington 98108

Re: December 2, 2010, NPDES Compliance Inspection
NPDES Permit Number WA0031968

Dear Mr. Armstrong:

On behalf of the United States Environmental Protection Agency (EPA), I would like to express my appreciation for your time and cooperation during the December 2, 2010, National Pollutant Discharge Elimination System (NPDES) inspection. The purpose of the inspection was to gather information regarding your operation as a part of an overall and ongoing evaluation of the compliance status of your facility with the NPDES Permit No. WA0031968 (Permit).

Part S1.B of the Permit states that "beginning on the effective date of this permit and lasting through the expiration date, the Permittee is authorized to discharge storm water discharges at the permitted location...." During the walkthrough portion of the inspection, the inspector noted that the docks and adjacent paved areas at your facility slope toward the Duwamish River instead of toward the industrial working area that discharges storm water through the permitted location. The inspector did not observe a discharge from the dock or adjacent paved areas at the time of the inspection, however, a direct discharge from these areas to the Duwamish River is a violation of Part S1.B of the Permit.

Although EPA exercises every precaution to ensure accurate inspection findings, we do not want to dismiss the possibility that the inspector may have failed to observe other areas of noncompliance. It is EPA's goal to ensure NPDES facilities comply fully with their permits, however, the ultimate responsibility rests with the facility. As such, I want to strongly encourage your facility to continue its efforts to maintain full knowledge of the Permit requirements and to take appropriate measures to ensure compliance.

Please do not hesitate to contact us with any questions regarding this letter. If you have any questions, please call Joe Roberto at 206-553-1669.

Sincerely,

Kimberly A. Ogle

Kimberly A. Ogle, Manager
NPDES Compliance Unit

cc: Kevin Fitzpatrick, Ecology
Ellen Stewart, Seattle Public Utilities

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Ed Armstrong
Seattle Iron & Metals Corp.
601 South Myrtle Street
Seattle, Washington 98108

2. Article Number (Transfer from service label) 7008 0150 0000 8075 9985

COMPLETE THIS SECTION ON DELIVERY

A. Signature X — ☐ Agent ☐ Addressee

B. Received by (Printed Name) Stephanie Gomes — C. Date of Delivery 4.16.14

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☑ Certified Mail ☐ Express Mail
☐ Registered ☑ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540

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Ed Armstrong
Seattle Iron & Metals Corp.
601 South Myrtle Street
Seattle, Washington 98108

7008 0150 0000 8075 9985

PS Form 3800, August 2006 See Reverse for Instructions

2. Warning Letter*

Case Name: Seattle Iron and Metals Corp.

City/State: Seattle, Washington

CONCURRENCES		
Title:	Compliance Officer	ORC Attorney (only FIFRA)
Name:	Joe Roberto	
Initials:	JR	
Date:	04/07/11	

If document is included, check YES. If not, check NO and explain.

	YES	NO	
Document for signature/concurrence	☑	☐	
Communication plan	☑	☐	CC the State and WDOE

Is facility located in Indian Country and/or a Tribal Facility (i.e., owned or controlled by a federally recognized Indian tribe)? ☐ YES ☑ NO

If **YES**, fill out and attach Addendum A: Facilities within Indian Country and Tribal Facilities.

RETURN package to COMPLIANCE OFFICER for mailing.

* For documents to be **signed** by an OCE manager, attach a completed OCE Correspondence Action Request to this checklist.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

NOV - 3 2010

OFFICE OF
COMPLIANCE AND ENFORCEMENT

Reply To: OCE-133

CERTIFIED MAIL – 7009 1410 0002 1489 0336
RETURN RECEIPT REQUESTED

WARNING LETTER

Alan P. Sidell
Seattle Iron and Metals Corporation
601 South Myrtle Street
Seattle, WA 98108

Re: April 29 and May 11, 2010, NPDES Compliance Inspections
NPDES Permit Number WA0031968

Dear Mr. Sidell:

On April 29 and May 11, 2010, the U.S. Environmental Protection Agency (EPA) inspected your scrap metal operation at 601 South Myrtle in Seattle, Washington, to determine its compliance with the requirements of the Clean Water Act (CWA) and the National Pollutant Discharge Elimination System (NPDES) permit that applies to this site, Washington State Industrial Storm Water General Permit Number WA0031968 (the Permit). I would like to express my appreciation for the time and cooperation of the Seattle Iron and Metals staff during the inspection. I would also like to express my condolences for the untimely loss of Mr. Eric Paul.

There are areas of concern regarding Seattle Iron and Metals Corporation's compliance with the Permit:

1. Section S2.B of the Permit states "Sampling and analytical methods used to meet the monitoring requirements specified in this permit must conform to the latest revision of the Guidelines Establishing Test Procedures for the Analysis of Pollutants contained in 40 C.F.R. Part 136."

   To be considered accurate and representative for the NPDES program, pH monitoring must be conducted according to test procedures approved under the Code of Federal Regulations (40 C.F.R. Part 136.3 *Table II-Required containers, preservation techniques, and holding times*). This part of the Code of Federal Regulations specifies that pH must be analyzed immediately, interpreted to mean within 15 minutes of sample collection. This typically means measuring pH on-site.

PCS 11/9/

During the April 29th inspection, Eric Paul told the inspectors were told that samples of the discharge are sent to a local laboratory for analysis. This practice appears to violate the above holding time requirements for pH monitoring.

2. A review of the discharge monitoring reports submitted by Seattle Iron and Metals Corporation to the Washington State Department of Ecology (Ecology) between December 2007 and February 2010 found 66 exceedances of the effluent limits listed in Section S1.B of the Permit. These exceedances are listed in the attachment.

During the May 11 inspection, the EPA inspectors took four sediment samples. The samples were of material accumulated in two roof drains, the catch basin in the employee parking lot, and a catch basin on the south side of South Myrtle Street adjacent to the facility entrance. Split samples were taken by Seattle Public Utilities for their analysis.

	Sampling Stations				Screening Criteria	
Pollutant mg/kg	**10194000**	**10194001**	**10194002**	**10194003**	**SQS / LAET**	**CSL/ 2LAET**
Copper	1,140	1,050	1,950	861	390	390
Lead	1,340	1,710	1,150	912	450	530
Zinc	4,900	7,520	4,780	4,380	410	960
Total PCBs (dry weight)	2.2	2.3	4.2	9.5	0.13	1.0
Total PCBs (organic carbon normalized)	22	31	51	64	12	65
Total petroleum hydrocarbon – motor oil range	740	380	2,500	1,600	Not applicable	
Total petroleum hydrocarbon – diesel oil range	Not detected	Not detected	Not detected	5,300	Not applicable	
Total organic carbon	100,000	75,300	81,600	149,000	Not applicable	

10194000 was collected from the main office roof drain (RD #1), 10194001 was collected from the maintenance roof gutter (RD #2), 10194002 was collected from the employee parking lot catch basin (CB 157), and 10194003 was collected from the catch basin on South Myrtle Street northwest of the main office (RCB189). Because these samples are solids with the potential to reach the Lower Duwamish Superfund site, they are here compared to the Washington State Sediment Management Standards (WAC 173-204).

I understand that Seattle Iron and Metals has agreed to the City of Seattle Public Utilities' Order for Corrective Action regarding the untreated discharges to the City owned South Myrtle Street and South Garden Street storm drains. I also understand that you are working with Ecology under an administrative order to address the exceedances of your permit effluent limits and to re-direct the heretofore untreated discharges to a treatment system. Due to these circumstances, this is a Warning Letter rather than a Notice of Violation. EPA is awaiting the outcome of these two efforts to determine whether any formal action by EPA is needed. If

subsequent inspections find that these violations have not been eliminated, formal enforcement actions, including penalties, may be assessed.

Please also be informed that although it is EPA's goal to ensure NPDES facilities comply fully with the Clean Water Act, the ultimate responsibility rests with the facility. As such, we strongly encourage your facility to maintain full knowledge of the applicable NPDES requirements and other appropriate statutes, and to take all appropriate measures to ensure compliance.

Please do not hesitate to contact us with any questions regarding this letter or other matters related to your compliance with the Clean Water Act. If you have any questions, please call Margaret McCauley at (206) 553-62323.

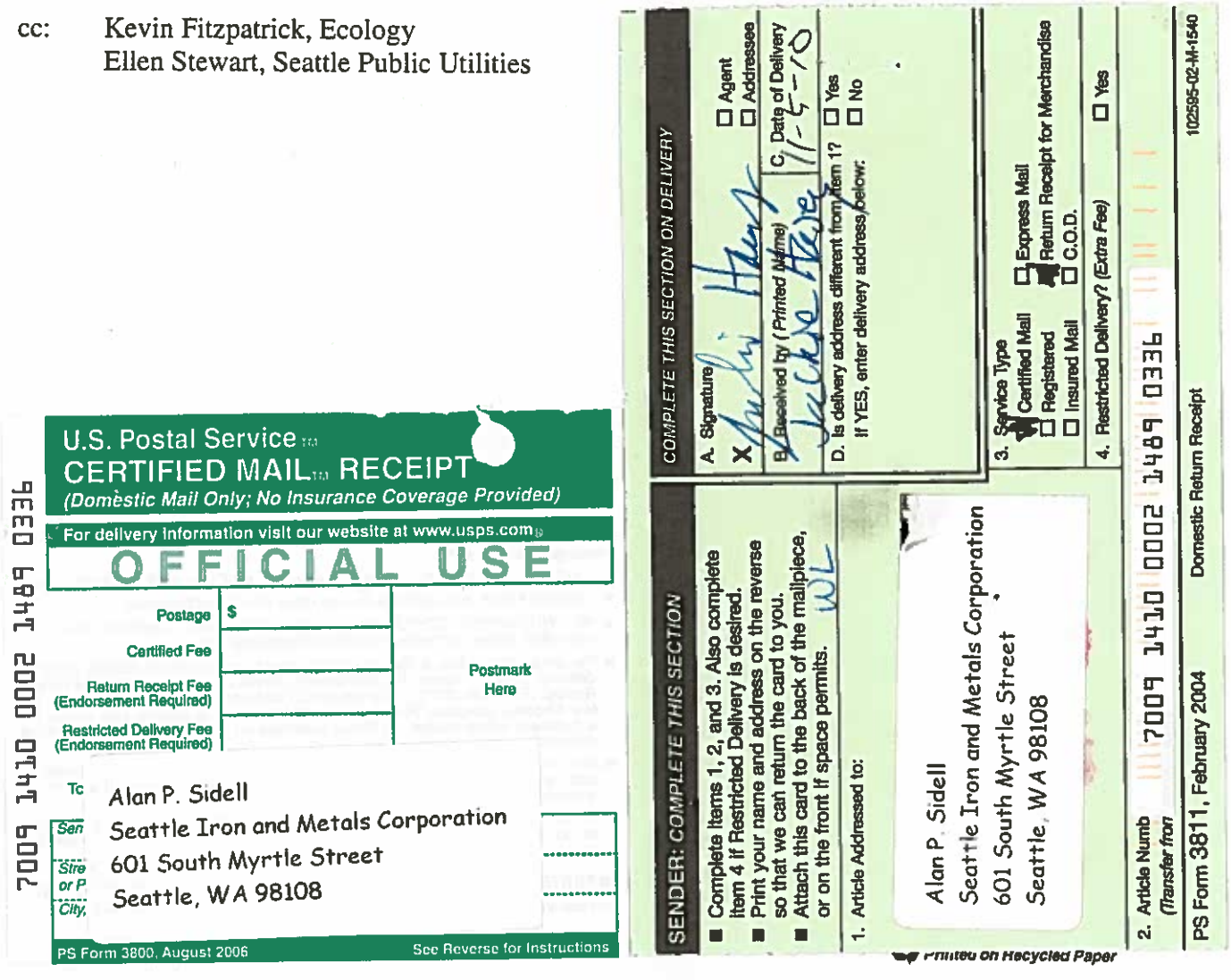
Sincerely,

Kimberly A. Ogle

Kimberly A. Ogle, Manager
NPDES Compliance Unit

Enclosure

cc: Kevin Fitzpatrick, Ecology
Ellen Stewart, Seattle Public Utilities



Seattle Iron & Metals		NPDES Permit Number WA0031968			
Effluent Violations					
Date	**Parameter**	**Value**	**Max**	**Unit**	**% above Max**
December 2007	Copper	102	5.8	UG/L	1759
December 2007	Zinc	1440	95.1	UG/L	1514
December 2007	TPH	17.1	5	Mg/L	342
December 2007	Turbidity	48	5	NTU	960
January 2008	Copper	55	5.8	UG/L	948
January 2008	Zinc	967	95.1	UG/L	1017
January 2008	TPH	33	5	Mg/L	660
January 2008	Turbidity	72	5	NTU	1440
February 2008	Copper	25	5.8	UG/L	431
February 2008	Zinc	725	95.1	UG/L	762
February 2008	TPH	33	5	UG/L	660
February 2008	Turbidity	54	5	NTU	1080
March 2008	Copper	34	5.8	UG/L	586
March 2008	Zinc	544	95.1	UG/L	572
March 2008	TPH	45	5	Mg/L	900
March 2008	Turbidity	63	5	NTU	1260
April 2008	TPH	13.2	5	Mg/L	264
April 2008	Turbidity	6.9	5	NTU	138
June 2008	Copper	15	5.8	UG/L	259
June 2008	Zinc	225	95.1	UG/L	237
June 2008	TPH	11.5	5	MG/L	230
June 2008	Turbidity	18	5	NTU	360
August 2008	Copper	10	5.8	UG/L	172
August 2008	Zinc	123	95.1	UG/L	129
August 2008	TPH	12.4	5	Mg/L	248
August 2008	Turbidity	44	5	NTU	880
October 2008	Copper	23	5.8	UG/L	397
October 2008	Zinc	510	95.1	UG/L	536
October 2008	Turbidity	140	5	NTU	2800
December 2008	Copper	13	5.8	UG/L	224
December 2008	Zinc	210	95.1	UG/L	221
December 2008	Turbidity	94	5	NTU	1880
February 2009	Copper	7.7	5.8	UG/L	133
February 2009	Turbidity	27	5	NTU	540
March 2009	Zinc	136	95	UG/L	143
March 2009	PCB	did not test	5	UG/L	
March 2009	Turbidity	66	5	NTU	1320
May 2009	Copper	32	5.8	UG/L	552
May 2009	Zinc	400	95.1	UG/L	421
May 2009	Turbidity	15	5	NTU	300

Date	Parameter	Value	Max	Unit	% above Max
August 2009	Copper	19	5.8	UG/L	328
August 2009	Zinc	180	95.1	UG/L	189
August 2009	Turbidity	27	5	Mg/L	540
September 2009	Copper	12	5.8	UG/L	207
September 2009	Zinc	140	95.1	UG/L	147
September 2009	Turbidity	32	5	NTU	640
October 2009	Copper	67	5.8	UG/L	1155
October 2009	Zinc	1100	95.1	UG/L	1157
October 2009	Turbidity	52	5	NTU	1040
November 2009	Copper	35	5.8	UG/L	603
November 2009	Zinc	370	95.1	UG/L	389
November 2009	TPH	28	5	Mg/L	560
November 2009	Turbidity	13	5	NTU	260
December 2009	Copper	28	5.8	UG/L	483
December 2009	Zinc	160	95.1	UG/L	168
December 2009	TPH	13	5	Mg/L	260
December 2009	Turbidity	10.7	5	NTU	214
December 2009	pH	12	9	S.U.	133
January 2010	Copper	20	5.8	UG/L	345
January 2010	Zinc	330	95.1	UG/L	347
January 2010	TPH	6.2	5	Mg/L	124
January 2010	Turbidity	19.2	5	Mg/L	384
February 2010	Copper	21	5.8	UG/L	362
February 2010	Zinc	190	95.1	UG/L	200
February 2010	TPH	5.2	5	Mg/L	104
February 2010	Turbidity	34	5	NTU	680
Total Effluent Violations Since Effective Date of the Permit (12/01/2007)= **66**					

2. Warning Letter*

Case Name: Seattle Iron and Metals

City/State: Seattle, Washington

CONCURRENCES		
Title:	Compliance Officer	ORC Attorney (only FIFRA)
Name:	Margaret McCauley	
Initials:	MMC	
Date:	Nov 3 2010	

If document is included, check YES. If not, check NO and explain.

	YES	NO	
Document for signature/concurrence	☒	☐	
Communication plan	☐	☒	No interest expected

Is facility located in Indian Country and/or a Tribal Facility (i.e., owned or controlled by a federally recognized Indian tribe)? ☐ YES ☒ NO

If **YES**, fill out and attach Addendum A: Facilities within Indian Country and Tribal Facilities.

RETURN package to COMPLIANCE OFFICER for mailing.

* For documents to be **signed** by an OCE manager, attach a completed OCE Correspondence Action Request to this checklist. A blank Request is at the end of these checklists, after Appendix A.

United States Environmental Protection Agency
Washington, D.C. 20460

Water Compliance Inspection Report

Section A: National Data System Coding (i.e., PCS)

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 N	WA0003191618	10 05 11	S	R	2

Remarks

21 ____ 66

Inspection Work Days	Facility Self-Monitoring Evaluation Rating	BI	QA	Reserved
67 10 69	70	71	72	73 74 75 80

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*

Seattle Iron & Metals Corp.
601 S. Myrtle St
Seattle WA 98108

Entry Time/Date	Permit Effective Date
9:30 AM 5-11-2010	12/01/2007
Exit Time/Date	**Permit Expiration Date**
1:30PM 5-11-2010	10/25/2012

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)

Raymond Perez - Water Treatment operator - 206 682-0640
Ed Armstrong - Ferrous/Maintenance Manager - 206 934-4446

Other Facility Data *(e.g., SIC NAICS, and other descriptive information)*

SIC - 5093
Scrap Metal Recycling

Name, Address of Responsible Official/Title/Phone and Fax Number

Eric Paul - Assistant V.P. of Operations

Contacted ☒ Yes ☐ No

Section C: Areas Evaluated During Inspection *(Check only those areas evaluated)*

☒ Permit	☐ Self-Monitoring Program	☐ Pretreatment	☐ MS4
☒ **Records/Reports**	☐ Compliance Schedules	☐ Pollution Prevention	
☒ Facility Site Review	☐ Laboratory	☒ Storm Water	
☐ Effluent/Receiving Waters	☒ Operations & Maintenance	☐ Combined Sewer Overflow	
☐ Flow Measurement	☐ Sludge Handling/Disposal	☐ Sanitary Sewer Overflow	

Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

SEV Codes SEV Description

Report to Follow

RECEIVED
MAY 11 2010
U.S. EPA REGION 10
OFFICE OF COMPLIANCE AND ENFORCEMENT

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers	Date
Jon Kenestrel	EPA R10 OCE 2065533563	05/11/2010
Dave Tetreau	EPA R10 OCE 206-553-6705	05/11/2010
Signature of Management Q A Reviewer	**Agency/Office/Phone and Fax Numbers**	**Date**
		06/17/10

EPA Form 3560-3 (Rev 1-06) Previous editions are obsolete.

PCS/ICIS
5-12-2010
M. Brown

INSTRUCTIONS

Section A: National Data System Coding *(i.e., PCS)*

Column 1: Transaction Code: Use N, C, or D for New, Change, or Delete. All inspections will be *new* unless there is an error in the data entered.

Columns 3-11: NPDES Permit No. Enter the facility's NPDES permit number - third character in permit number indicates permit type for U=unpermitted, G=general permit, etc.. *(Use the Remarks columns to record the State permit number, if necessary.)*

Columns 12-17: Inspection Date. Insert the date entry was made into the facility. Use the year/month/day format (e.g., 04/10/01 = October 01, 2004).

Column 18: Inspection Type*. Use one of the codes listed below to describe the type of inspection:

A	Performance Audit
B	Compliance Biomonitoring
C	Compliance Evaluation (non-sampling)
D	Diagnostic
F	Pretreatment (Follow-up)
G	Pretreatment (Audit)
I	Industrial User (IU) Inspection
J	Complaints
M	Multimedia
N	Spill
O	Compliance Evaluation (Oversight)
P	Pretreatment Compliance Inspection
R	Reconnaissance
S	Compliance Sampling
U	IU Inspection with Pretreatment Audit
X	Toxics Inspection
Z	Sludge - Biosolids
#	Combined Sewer Overflow-Sampling
$	Combined Sewer Overflow-Non-Sampling
+	Sanitary Sewer Overflow-Sampling
&	Sanitary Sewer Overflow-Non-Sampling
\	CAFO-Sampling
=	CAFO-Non-Sampling
2	IU Sampling Inspection
3	IU Non-Sampling Inspection
4	IU Toxics Inspection
5	IU Sampling Inspection with Pretreatment
6	IU Non-Sampling Inspection with Pretreatment
7	IU Toxics with Pretreatment
!	Pretreatment Compliance (Oversight)
@	Follow-up (enforcement)
{	Storm Water-Construction-Sampling
}	Storm Water-Construction-Non-Sampling
:	Storm Water-Non-Construction-Sampling
~	Storm Water-Non-Construction-Non-Sampling
<	Storm Water-MS4-Sampling
-	Storm Water-MS4-Non-Sampling
>	Storm Water-MS4-Audit

Column 19: Inspector Code. Use one of the codes listed below to describe the *lead agency* in the inspection.

A —	State (Contractor)
B —	EPA (Contractor)
E —	Corps of Engineers
J —	Joint EPA/State Inspectors—EPA Lead
L —	Local Health Department (State)
N —	NEIC Inspectors
O—	Other Inspectors, Federal/EPA (Specify in Remarks columns)
P—	Other Inspectors, State (Specify in Remarks columns)
R —	EPA Regional Inspector
S —	State Inspector
T —	Joint State/EPA Inspectors—State lead

Column 20: Facility Type. Use one of the codes below to describe the facility.

1 — Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.
2 — Industrial. Other than municipal, agricultural, and Federal facilities.
3 — Agricultural. Facilities classified with 1987 SIC 0111 to 0971.
4 — Federal. Facilities identified as Federal by the EPA Regional Office.
5 — Oil & Gas. Facilities classified with 1987 SIC 1311 to 1389.

Columns 21-66: Remarks. These columns are reserved for remarks at the discretion of the Region.

Columns 67-69: Inspection Work Days. Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, and remote sensing; and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation.

Column 70: Facility Evaluation Rating. Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

Column 71: Biomonitoring Information. Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

Column 72: Quality Assurance Data Inspection. Enter Q if the inspection was conducted as followup on quality assurance sample results. Enter N otherwise.

Columns 73-80: These columns are reserved for regionally defined information.

Section B: Facility Data

This section is self-explanatory except for "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, other updates to the record, SIC/NAICS Codes, Latitude/Longitude).

Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. Use the headings given on the report form (e.g., Permit, Records/Reports) when discussing the areas evaluated during the inspection.

Section D: Summary of Findings/Comments

Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.

*Footnote: In addition to the inspection types listed above under column 18, a state may continue to use the following wet weather and CAFO inspection types until the state is brought into ICIS-NPDES: K: CAFO, V: SSO, Y: CSO, W: Storm Water 9: MS4. States may also use the new wet weather, CAFO and MS4 inspections types shown in column 18 of this form. The EPA regions are required to use the new wet weather, CAFO, and MS4 inspection types for inspections with an inspection date (DTIN) on or after July 1, 2005.

C4

United States Environmental Protection Agency
Washington, D.C. 20460

Water Compliance Inspection Report

Section A: National Data System Coding (i.e., PCS)

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 M	WA0031968	140502	-	R	2

Remarks

21 ... 66

Inspection Work Days	Facility Self-Monitoring Evaluation Rating	BI	QA	Reserved
67 10 69	70	71	72	73 74 75 ... 80

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*	Entry Time/Date	Permit Effective Date
Seattle Iron and Metals Corp. 601 South Myrtle Street Seattle, WA 98108	11:05am/05/02/14	10/01/2013
	Exit Time/Date 11:10am/05/02/14	Permit Expiration Date 10/01/2018

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)	Other Facility Data *(e.g., SIC NAICS, and other descriptive information)*
Unknown. This was a drive-by reconnaissance visit and we did not meet with facility representatives.	SIC = 5093 Lat.: 47.53923 Long.: -122.327206 Reconnaissance, Non-Sampling
Name, Address of Responsible Official/Title/Phone and Fax Number See above response.	Contacted ☐ Yes ☑ No

Section C: Areas Evaluated During Inspection *(Check only those areas evaluated)*

☐ Permit	☐ Self-Monitoring Program	☐ Pretreatment	☐ MS4
☐ **Records/Reports**	☐ Compliance Schedules	☐ Pollution Prevention	
☑ Facility Site Review	☐ Laboratory	☐ Storm Water	
☐ Effluent/Receiving Waters	☐ Operations & Maintenance	☐ Combined Sewer Overflow	
☐ Flow Measurement	☐ Sludge Handling/Disposal	☐ Sanitary Sewer Overflow	

Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

SEV Codes SEV Description

RECEIVED
MAY 14 2014
Inspection & Enforcement Management Unit (IEMU)

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers	Date
Joseph Roberto	EPA/OCE/206-553-1669	05/09/14
Sandra Brozusky	EPA/OCE/206-553-5317	
Signature of Management Q A Reviewer	Agency/Office/Phone and Fax Numbers	Date

EPA Form 3560-3 (Rev 1-06) Previous editions are obsolete.

ICIS.
5-15-2014
JBrown

INSTRUCTIONS

Section A: National Data System Coding *(i.e., PCS)*

Column 1: Transaction Code: Use N, C, or D for New, Change, or Delete. All inspections will be *new* unless there is an error in the data entered.

Columns 3-11: NPDES Permit No. Enter the facility's NPDES permit number - third character in permit number indicates permit type for U=unpermitted, G=general permit, etc.. *(Use the Remarks columns to record the State permit number, if necessary.)*

Columns 12-17: Inspection Date. Insert the date entry was made into the facility. Use the year/month/day format (e.g., 04/10/01 = October 01, 2004).

Column 18: Inspection Type*. Use one of the codes listed below to describe the type of inspection:

A	Performance Audit	U	IU Inspection with Pretreatment Audit	!	Pretreatment Compliance (Oversight)
B	Compliance Biomonitoring	X	Toxics Inspection	@	Follow-up (enforcement)
C	Compliance Evaluation (non-sampling)	Z	Sludge - Biosolids	{	Storm Water-Construction-Sampling
D	Diagnostic	#	Combined Sewer Overflow-Sampling	}	Storm Water-Construction-Non-Sampling
F	Pretreatment (Follow-up)	$	Combined Sewer Overflow-Non-Sampling	:	Storm Water-Non-Construction-Sampling
G	Pretreatment (Audit)	+	Sanitary Sewer Overflow-Sampling	~	Storm Water-Non-Construction-Non-Sampling
I	Industrial User (IU) Inspection	&	Sanitary Sewer Overflow-Non-Sampling	<	Storm Water-MS4-Sampling
J	Complaints	\	CAFO-Sampling	-	Storm Water-MS4-Non-Sampling
M	Multimedia	=	CAFO-Non-Sampling	>	Storm Water-MS4-Audit
N	Spill	2	IU Sampling Inspection		
O	Compliance Evaluation (Oversight)	3	IU Non-Sampling Inspection		
P	Pretreatment Compliance Inspection	4	IU Toxics Inspection		
R	Reconnaissance	5	IU Sampling Inspection with Pretreatment		
S	Compliance Sampling	6	IU Non-Sampling Inspection with Pretreatment		
		7	IU Toxics with Pretreatment		

Column 19: Inspector Code. Use one of the codes listed below to describe the *lead agency* in the inspection.

A — State (Contractor)
B — EPA (Contractor)
E — Corps of Engineers
J — Joint EPA/State Inspectors—EPA Lead
L — Local Health Department (State)
N — NEIC Inspectors
O — Other Inspectors, Federal/EPA (Specify in Remarks columns)
P — Other Inspectors, State (Specify in Remarks columns)
R — EPA Regional Inspector
S — State Inspector
T — Joint State/EPA Inspectors—State lead

Column 20: Facility Type. Use one of the codes below to describe the facility.

1 — Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.
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5 — Oil & Gas. Facilities classified with 1987 SIC 1311 to 1389.

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United States Environmental Protection Agency
Washington, D.C. 20460

Water Compliance Inspection Report

Section A: National Data System Coding (i.e., PCS)

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 N	WA0031968	140501	-	R	2

Remarks

21 ... 66

Inspection Work Days	Facility Self-Monitoring Evaluation Rating	BI	QA	Reserved
67 10 69	70	71	72	73 74 75 ... 80

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*

Seattle Iron and Metals Corp.
601 South Myrtle Street
Seattle, WA 98108

Entry Time/Date	Permit Effective Date
11:30am/05/01/14	10/01/2013
Exit Time/Date	**Permit Expiration Date**
11:32am/05/01/14	10/01/2018

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)

Unknown. This was a drive-by reconnaissance visit and we did not meet with facility representatives.

Other Facility Data *(e.g., SIC NAICS, and other descriptive information)*

SIC = 5093

Lat.: 47.53923
Long.: -122.327206

Reconnaissance, Non-Sampling

Name, Address of Responsible Official/Title/Phone and Fax Number

See above response.

Contacted ☐ Yes ☑ No

Section C: Areas Evaluated During Inspection *(Check only those areas evaluated)*

☐ Permit	☐ Self-Monitoring Program	☐ Pretreatment	☐ MS4
☐ **Records/Reports**	☐ Compliance Schedules	☐ Pollution Prevention	
☑ Facility Site Review	☐ Laboratory	☐ Storm Water	
☐ Effluent/Receiving Waters	☐ Operations & Maintenance	☐ Combined Sewer Overflow	
☐ Flow Measurement	☐ Sludge Handling/Disposal	☐ Sanitary Sewer Overflow	

Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

SEV Codes SEV Description

RECEIVED
MAY 14 2014
Inspection & Enforcement Management Unit (IEMU)

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers	Date
Joseph Roberto	EPA/OCE/206-553-1669	05/09/14
Sandra Brozusky	EPA/OCE/206-553-5317	
Signature of Management Q A Reviewer	**Agency/Office/Phone and Fax Numbers**	**Date**

EPA Form 3560-3 (Rev 1-06) Previous editions are obsolete.

ICIS.
5-15-2014

INSTRUCTIONS

Section A: National Data System Coding *(i.e., PCS)*

Column 1: Transaction Code: Use N, C, or D for New, Change, or Delete. All inspections will be *new* unless there is an error in the data entered.

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A	Performance Audit	U	IU Inspection with Pretreatment Audit	I	Pretreatment Compliance (Oversight)
B	Compliance Biomonitoring	X	Toxics Inspection	@	Follow-up (enforcement)
C	Compliance Evaluation (non-sampling)	Z	Sludge - Biosolids	{	Storm Water-Construction-Sampling
D	Diagnostic	#	Combined Sewer Overflow-Sampling	}	Storm Water-Construction-Non-Sampling
F	Pretreatment (Follow-up)	$	Combined Sewer Overflow-Non-Sampling	:	Storm Water-Non-Construction-Sampling
G	Pretreatment (Audit)	+	Sanitary Sewer Overflow-Sampling	~	Storm Water-Non-Construction-Non-Sampling
I	Industrial User (IU) Inspection	&	Sanitary Sewer Overflow-Non-Sampling	<	Storm Water-MS4-Sampling
J	Complaints	\	CAFO-Sampling	-	Storm Water-MS4-Non-Sampling
M	Multimedia	=	CAFO-Non-Sampling	>	Storm Water-MS4-Audit
N	Spill	2	IU Sampling Inspection		
O	Compliance Evaluation (Oversight)	3	IU Non-Sampling Inspection		
P	Pretreatment Compliance Inspection	4	IU Toxics Inspection		
R	Reconnaissance	5	IU Sampling Inspection with Pretreatment		
S	Compliance Sampling	6	IU Non-Sampling Inspection with Pretreatment		
		7	IU Toxics with Pretreatment		

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A — State (Contractor)
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L — Local Health Department (State)
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Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. Use the headings given on the report form (e.g., Permit, Records/Reports) when discussing the areas evaluated during the inspection.

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Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.

*Footnote: In addition to the inspection types listed above under column 18, a state may continue to use the following wet weather and CAFO inspection types until the state is brought into ICIS-NPDES: K: CAFO, V: SSO, Y: CSO, W: Storm Water 9: MS4. States may also use the new wet weather, CAFO and MS4 inspections types shown in column 18 of this form. The EPA regions are required to use the new wet weather, CAFO, and MS4 inspection types for inspections with an inspection date (DTIN) on or after July 1, 2005.

United States Environmental Protection Agency
Washington, D.C. 20460

Water Compliance Inspection Report

Section A: National Data System Coding (i.e., PCS)

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
N	WA0003198	130829	-	R	2

Remarks

21 ____ 66

Inspection Work Days	Facility Self-Monitoring Evaluation Rating	BI	QA	Reserved
05	70	71	72	73 74 75 ____ 80

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*	Entry Time/Date	Permit Effective Date
Seattle Iron and Metal Corp. 601 South Myrtle Street Seattle, WA 98108	11:07AM/ 08/29/13	01/01/2010
	Exit Time/Date	**Permit Expiration Date**
	11:10 AM/ 08/29/13	01/01/2015

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)
N/A. This was a drive-by reconnaissance inspection.

Other Facility Data *(e.g., SIC NAICS, and other descriptive information)*
Lat.: 47.53941 Long.: -122.32544

Name, Address of Responsible Official/Title/Phone and Fax Number
N/A. This was a drive-by reconnaissance inspection.

Contacted ☐ Yes ☑ No

RECEIVED
SEP - 4 2013
Inspection & Enforcement Management Unit (IEMU)

Section C: Areas Evaluated During Inspection *(Check only those areas evaluated)*

☐ Permit	☐ Self-Monitoring Program	☐ Pretreatment	☐ MS4
☐ **Records/Reports**	☐ Compliance Schedules	☐ Pollution Prevention	
☐ Facility Site Review	☐ Laboratory	☑ Storm Water	
☐ Effluent/Receiving Waters	☐ Operations & Maintenance	☐ Combined Sewer Overflow	
☐ Flow Measurement	☐ Sludge Handling/Disposal	☐ Sanitary Sewer Overflow	

Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

SEV Codes SEV Description

This was a drive-by reconnaissance inspection to determine if a more thorough inspection is required. Large piles of material were observed.

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers	Date
Joseph Roberto	EPA/OCE/206-553-1669	September 3, 2013
Brian Levo	EPA/OCE/206-553-1816	September 3, 2013
Signature of Management Q A Reviewer	**Agency/Office/Phone and Fax Numbers**	**Date**

EPA Form 3560-3 (Rev 1-06) Previous editions are obsolete.

ICIS.
9-5-2013

INSTRUCTIONS

Section A: National Data System Coding *(i.e., PCS)*

Column 1: Transaction Code: Use N, C, or D for New, Change, or Delete. All inspections will be *new* unless there is an error in the data entered.

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A	Performance Audit	U	IU Inspection with Pretreatment Audit	!	Pretreatment Compliance (Oversight)
B	Compliance Biomonitoring	X	Toxics Inspection	@	Follow-up (enforcement)
C	Compliance Evaluation (non-sampling)	Z	Sludge - Biosolids	{	Storm Water-Construction-Sampling
D	Diagnostic	#	Combined Sewer Overflow-Sampling	}	Storm Water-Construction-Non-Sampling
F	Pretreatment (Follow-up)	$	Combined Sewer Overflow-Non-Sampling	:	Storm Water-Non-Construction-Sampling
G	Pretreatment (Audit)	+	Sanitary Sewer Overflow-Sampling	~	Storm Water-Non-Construction-Non-Sampling
I	Industrial User (IU) Inspection	&	Sanitary Sewer Overflow-Non-Sampling	<	Storm Water-MS4-Sampling
J	Complaints	\	CAFO-Sampling	-	Storm Water-MS4-Non-Sampling
M	Multimedia	=	CAFO-Non-Sampling	>	Storm Water-MS4-Audit
N	Spill	2	IU Sampling Inspection		
O	Compliance Evaluation (Oversight)	3	IU Non-Sampling Inspection		
P	Pretreatment Compliance Inspection	4	IU Toxics Inspection		
R	Reconnaissance	5	IU Sampling Inspection with Pretreatment		
S	Compliance Sampling	6	IU Non-Sampling Inspection with Pretreatment		
		7	IU Toxics with Pretreatment		

Column 19: Inspector Code. Use one of the codes listed below to describe the *lead agency* in the inspection.

A — State (Contractor)
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SCRAP IRON
NON-FERROUS METALS
STEEL PRODUCTS

SEATTLE IRON & METALS CORP.

JOHN R. FRANKLIN
Stormwater Treatment System Operator

(206) 682-0040 Main
(206) 396-7861 Cell
(206) 623-1231 Fax

601 S. Myrtle St.
Seattle, WA 98108
E-mail: jfranklin@seairon.com

SCRAP IRON
NON-FERROUS METALS
STEEL PRODUCTS

SEATTLE IRON & METALS CORP.

ED ARMSTRONG
Ferrous / Maintenance Manager

(206) 682-0040
Direct (206) 834-4446
Fax (206) 623-1231
Cell (206) 396-0569

601 S. Myrtle St.
Seattle, WA 98108
E-mail: earmstrong@seairon.com

C3

United States Environmental Protection Agency
Washington, D.C. 20460

Water Compliance Inspection Report

Section A: National Data System Coding (i.e., PCS)

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 N	WA0003198	101202	~	2 ER	2

Remarks

21 ____ 66

Inspection Work Days	Facility Self-Monitoring Evaluation Rating	BI	QA	Reserved
67 12 69	70	71	72 N	73 74 75 80

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*

Seattle Iron & Metals Corp.
601 South Myrtle Street
Seattle, WA 98101

Entry Time/Date	Permit Effective Date
2:45p 12/02/10	12/01/07
Exit Time/Date	**Permit Expiration Date**
4:30p 12/02/10	10/25/12

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)

Ed Armstrong
Ferrous/Maintenance Manager
(206) 834-4446
(206) 623-1231

John Franklin
Stormwater Treatment System Operator
(206) 682-0040
(206) 623-1231

Other Facility Data *(e.g., SIC NAICS, and other descriptive information)*

SIC - 5093

Scrap Metal Recycling

Name, Address of Responsible Official/Title/Phone and Fax Number

Ed Armstrong
Ferrous/Maintenance Manager
(206) 834-4446
(206) 623-1231

Contacted ☑ Yes ☐ No

Section C: Areas Evaluated During Inspection *(Check only those areas evaluated)*

☑ Permit	☐ Self-Monitoring Program	☐ Pretreatment	☐ MS4
☐ Records/Reports	☐ Compliance Schedules	☑ Pollution Prevention	
☐ Facility Site Review	☐ Laboratory	☑ Storm Water	
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SEV Codes SEV Description

RECEIVED
DEC 15 2010
U.S. EPA REGION 10
OFFICE OF COMPLIANCE AND ENFORCEMENT

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers	Date
Derek Schruhl Derek Schruhl	EPA/R10/206-553-1146	12/15/10
Melissa McAfee	Puget Sound Clean Air Agency, 206-786-4897	
Signature of Management Q A Reviewer	**Agency/Office/Phone and Fax Numbers**	**Date**
Kimberly A. Ogle	EPA/R10/206 553-0955	12/15/10

EPA Form 3560-3 (Rev 1-06) Previous editions are obsolete

ICIS/PCS
2-2-2011 MB

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NPDES
Inspection Report

Seattle Iron & Metals Corp.

601 South Myrtle Street
Seattle, Washington 98108

December 2, 2010

Prepared by:
Derek Schruhl, Environmental Scientist
Environmental Protection Agency, Region 10
Office of Compliance and Enforcement
NPDES Compliance Unit

Table of Contents

(Unless otherwise noted, all details in this inspection report were obtained from conversations with Ed Armstrong, John Franklin or from observations during the inspection.)

I. Facility Information

Facility Name:	Seattle Iron & Metals Corp.
Facility Contact(s):	Ed Armstrong – Ferrous/Maintenance Manager Phone: (206) 834-4446 John R. Franklin – Stormwater Treatment System Operator Phone: (206) 682-0040
SIC Code/Facility Type:	(5093) – Scrap Metal Yard
Facility Location:	601 South Myrtle Street Seattle, Washington 98108
GPS Location:	Lat: N 47.53924 degrees Long: W 122.32771 degrees
Mailing Address:	601 South Myrtle Street Seattle, Washington 98108

II. Inspection Information

Inspection Date:	December 2, 2010
Inspector(s):	Derek Schruhl, Compliance Officer EPA Region 10, OCE / NCU (206) 553-1146 Melissa McAfee, Inspector Puget Sound Clean Air Agency (206) 786-4897
Arrival Time: Departure Time:	2:45 PM 4:30 PM
Weather:	high clouds, mostly sunny.
Purpose:	The inspection was conducted to observe a PSCAA Inspector document the facility's compliance with applicable air regulations as part of an ongoing Puget Sound multi-media case and to continue to document the facility's compliance with their NPDES Individual Permit No. WA0031968.

III. Facility Description

Seattle Iron & Metals is a scrap metal yard facility that collects ferrous and non-ferrous metals for recycling. After collection, metals are sorted by grade and size, shredded, and sold to other companies for recycling. There is no significant processing of the metals at this facility other than size reduction.

The industrial activity at the plant is exposed to stormwater and the discharge location is the Duwamish River (See attachment A, Facility Map of 5/11/10 Inspection). The facility is currently operating under NPDES Individual Permit No. WA0031968.

IV. Owner and Operator Information

Seattle Iron & Metals Corp. is owned by the Sidell family, and currently operated by Ed Armstrong (due to passing of Eric Paul in August).

V. Compliance History

See May 11, 2010 Inspection report for detailed compliance history review.

VI. Scope of Inspection

This inspection consisted of an opening conference to conduct initial introductions and to discuss the purpose and expectations of the air inspection and NPDES compliance follow-up, review of applicable records, facility tour, and a closing conference to discuss compliance related concerns.

VII. Inspection Entry

I first arrived at the site on December 2, 2010 and met with Melissa McAfee of Puget Sound Clean Air Agency outside of the SIM facility. The purpose of this visit was to observe an air inspection by Melissa McAfee and to conduct a follow up inspection to previous NPDES inspections as EPA continues to track the development of this multimedia case.

Shortly after arriving outside the facility we entered the main administrative building and announced our presence to the teller who notified the appropriate individual. We met Ed Armstrong, Ferrous/Maintenance Manager and John Franklin, Stormwater Treatment System Operator and explained the purpose of our visit and presented our respective credentials.

VIII. Inspection Findings

After the opening conference we proceeded to talk with Mr. Armstrong and Mr. Franklin about their air pollution control measures and reviewed relevant records. We then went outside and Mr. Armstrong visually described the efforts. Mr. Armstrong required leave and so Mr. Franklin talked further with us in the office about stormwater control then gave us brief tour of the facility highlighting important stormwater features.

A. *Air Pollution Control Measures Related to NPDES*

Deposition of particulates on the roofs of buildings on-site for which stormwater run-off goes directly to city stormwater lines had been identified as a concern during a previous inspection on May 11, 2010 and there are plans to address this concern through a voluntary agreement with Seattle Public Utilities. Mr. Armstrong told us he had recently had all the roofs, gutters, and downspouts cleaned. He provided a receipt included with this inspection as Attachment A. Mr. Franklin noted that most of the debris was in the gutters.

Ms. McAfee asked Mr. Armstrong to describe how the shredder works and the process for limiting release of particulates to the air. He described the shredder as an auto-assisted feed that is Programmable Logic Controller (PLC) controlled (see Attachment F, photo 2). There is also PLC controlled water injection into the shredder that runs between 20 and 60 gallons per minute. They also have the ability to deluge the shredder with 500 gallons if conditions call for it. Their process for feeding the shredder is to mix various types of metal to limit wear on the shredder, alternating between harder metals such as crushed cars and more easily shred items as loose metal material. He said this reduces heat and stress on the shredder. The water injected into the shredder that doesn't steam off is collected by the stormwater system. Per request from Ms. McAfee, Mr. Armstrong provided activity logs, included with this inspection as Attachment C, for the days that EPA air testing was conducted. He also said that we would provide more specific daily production reports, included with this inspection as Attachment D, from the shredder for the same dates post-inspection as he could not locate all of them before he needed to leave.

Mr. Armstrong then took us outside and visually pointed out the various elements of the shredder including the conveyer belt feed-in, the main shredder compartment, and bag house where air particulates from the shredder are collected.

(see attachment E, Ms. McAfee's Final Inspection Report for additional inspection details)

B. *Stormwater Control*

Mr. Armstrong described another element of an agreement with SPU that his company is carrying out to attempt to reduce off-site stormwater discharges to the city stormwater lines. SIM has a sweeper truck that they use to sweep the street and entrance of the facility. They try to do so every night. He also mentioned that there had been discussion on a tire wash and that he felt there was insufficient space between the truck scales and the public right of way at the entrance of the facility. He said he was under the impression that SPU, Ecology and EPA felt the same way. When asked if he had had any engineers or consultants review this issue he noted it is apparent that there is not enough room for large trucks to be thoroughly cleaned before entering the roadway. (see attachment F, photo 1).

We finished our questions for Mr. Armstrong and after he required leave Mr. Franklin gave of a guided tour of the stormwater system covering the main components including location of access to underground elements of treatment system and its outfall location (see Attachment F, photos 3 and 4). He also guided us to areas of the facility adjacent to the shredder including to view both docks at the facility (see Attachment F, photos 5-10). Mr. Franklin noted that the vortex pretreatment had been installed at the end of September. He could not characterize if the pretreatment had had an effect on the effectiveness of the treatment process at this time. (see Ms. McAfee's Final inspection report as attachment E of this report and EPA's 5/11/2010 Inspection report for additional details of the stormwater treatment system.)

IX. Areas of Concern

We conducted a walkthrough of the facility and review of shredder operating records. Observations during the inspection included the identification of one area of concern as described below.

A. *Stormwater Controls on Docks*

Section S1.B of the Permit states that "beginning on the effective date of this permit and lasting through the expiration date, the Permittee is authorized to discharge stormwater discharges at the permitted location...." During the walkthrough it was noted that the docks and adjacent paved areas slope not toward the stormwater contained industrial working area that is discharged through the permitted location but toward the Duwamish River. There appeared to be a lack of stormwater controls to prevent direct runoff into the waterway. At the time of the inspection no direct stormwater discharge from this area was observed.

X. Closing Conference

A short closing conference was held with Mr. Franklin at the time of inspection. We ensured any questions were answered and Ms. McAfee gave Mr. Franklin her Compliance Status Report, included with this inspection as Attachment B, with a request for the daily production reports.

*Ms. McAfee's final inspection report given to the facility is included with this report as Attachment E.

Report Completion Date: _____

Lead Inspector Signature: _____

XI. Attachments

A. *Roof Cleaning Receipt*

DAVID'S
ROOF CLEANING AND REPAIR, LLC

Contr.# DAVIDRC944QE

1457 N. Bennett Street • Tacoma, WA 98406
(253) 565-1088 Seattle Line (206) 229-4411 Fax (253) 756-8707

4226-11

EXPERT LOW PRESSURE ROOF CLEANING

NAME	SEATTLE IRON + METALS	DATE	11/12/10
ADDRESS	601 S MYRTLE ST		
CITY	SEATTLE, WA 98108		
PHONE	Jeff Hill 206-396-7861	FAX	206-623-1231

ROOFS / GUTTERS CLEAN AS DIRECTED PER CONTACT 10/29 DC

ROOF & GUTTER CLEANING MAIN OFFICE STRUCTURE		
3 LEVEL FLAT ROOF CLEAN, ROOF DRAINS CLEAN	600	00
THE LOCKERS - FLAT ROOF CLEAN, DRAIN & GUTTER	300	00
METAL ROOFS		
SPOT CLEAN AS NEED, SOAP & RINSE		
CLEAN ALL GUTTERS COMPLETE. ASL DOWNSPOUTS		
WHERE NEED. CLEAN UP COMPLETE. BAG UP DEBRIS		
AND HAUL LOWER TO GROUND.		
HUB / BAKER	1200	00
STEEL WORKS	500	00
STEEL WORKS TENANT	700	00
SCALE HOUSE	300	00
EQUIPMENT MAINT	700	00
MISCELLANEOUS SMALL ROOF WEST OF BAKER BLDG	200	00
SUB TOTAL	4500	00
TAX	441	00
TOTAL	4941	00

THANK YOU!

B. *PSCAA Compliance Status Report*

pscleanair.org
Puget Sound Clean Air Agency

Puget Sound Clean Air Agency
1904 3rd Avenue, Suite 105
Seattle, WA 98101-3317
phone 206-343-8800 / 1-800-552-3565 fax 206-343-7522

Compliance Status Report

Evaluation Date: 12-2-10

Time: 1425

Case No	Registration No	Name	
	17104	Seattle Iron + Metals Corp	
Responsible Person, Title	Ed Armstrong, Prod Mgr		
Location (Address)		City, Zip	County
601 S Myrtle St		Seattle 98108	KING
Mailing Address		City, State, Zip	Phone
Same			206-682-0040

☐ I observed no violations of our Agency's regulations during my inspection in the areas I inspected.

☑ I need more information. Please submit the following information by: 10 days

(1) Please submit Daily Production Reports for Oct 15-30, Nov 2-5, and Dec 2-3, 2010 (Reg I Art 5)

(2) Continue to implement fugitive dust controls (Reg I 9.15)

Issued by: M McAfee
melissam@pscleanair.org

Received by: [signature]
signature

Date/Time: 12-2-10 1620
Derek Schruhl schruhl.derek@epa.gov

John Franklin
print name

Signing this document is not an admission of guilt

C. *Activity Logs*

SHREDDER

O & M ACTIVITY LOG

FOR THE MONTH OF OCTOBER 2010

DATE/RUN			VISUAL INSPECTIONS						PRESSURE GAUGE NORMAL RANGE		MILL WATER SYSTEMS CHECK	NOTES
			VISIBLE EMISSIONS		EXHAUST STACK EMISSIONS		DUST ACCUM.					
	Y	N	Y	N	Y	N	Y	N	Y	N	CHECK	
1	✓			✓		✓		✓	✓		✓	
2		✓										
3		✓										
4	✓			✓		✓		✓	✓		✓	
5	✓			✓		✓		✓	✓		✓	
6	✓			✓		✓		✓	✓		✓	
7	✓			✓		✓		✓	✓		✓	
8	✓			✓		✓		✓	✓		✓	
9		✓										
10		✓										
11	✓			✓		✓		✓	✓		✓	
12	✓			✓		✓		✓	✓		✓	
13	✓			✓		✓		✓	✓		✓	
14	✓			✓		✓		✓	✓		✓	
15	✓			✓		✓		✓	✓		✓	
16		✓										
17		✓										
18	✓			✓		✓		✓	✓		✓	
19	✓			✓		✓		✓	✓		✓	
20	✓			✓		✓		✓	✓		✓	
21	✓			✓		✓		✓	✓		✓	
22	✓			✓		✓		✓	✓		✓	
23		✓										
24		✓										
25	✓			✓		✓		✓	✓		✓	
26	✓			✓		✓		✓	✓		✓	
27	✓			✓		✓		✓	✓		✓	
28	✓			✓		✓		✓	✓		✓	
29	✓			✓		✓		✓	✓		✓	
30		✓										
31		✓										

Corrective Actions Taken:

SHREDDER
O & M ACTIVITY LOG
FOR THE MONTH OF NOVEMBER 2010

DATE/RUN			VISUAL INSPECTIONS						PRESSURE GAUGE NORMAL RANGE		MILL WATER SYSTEMS CHECK	NOTES
			VISIBLE EMISSIONS		EXHAUST STACK EMISSIONS		DUST ACCUM.					
	Y	N	Y	N	Y	N	Y	N	Y	N		
1	✓			✓		✓		✓	✓		✓	
2	✓			✓		✓		✓	✓		✓	
3	✓			✓		✓		✓	✓		✓	
4	✓			✓		✓		✓	✓		✓	
5	✓											
6		✓	SAT.									
7		✓	SUN.									
8	✓		✓			✓		✓	✓		✓	SMALL AMT. BLUE SMOKE ADDED ↑ WATER
9	✓			✓		✓		✓	✓		✓	
10	✓			✓		✓		✓	✓		✓	
11	✓			✓		✓		✓	✓		✓	
12	✓			✓		✓		✓	✓			
13	✓			✓		✓		✓	✓			
14												
15	✓			✓		✓		✓	✓			130 to 140 GPM Adjustment water
16	✓			✓		✓		✓	✓			
17	✓			✓		✓		✓	✓			
18	✓			✓		✓		✓	✓			minor smoke, ↑ water
19	✓											
20	✓	✓										
21		✓										
22	✓	✓		✓		✓		✓	✓		✓	ok
23		✓										Bad weather
24		✓										" "
25		✓										" "
26		✓										Holiday
27		✓										Holiday
28		✓										
29	✓			✓		✓		✓	✓		✓	ok
30	✓			✓		✓		✓	✓		✓	ok
31												

Corrective Actions Taken:

SHREDDER

O & M ACTIVITY LOG

FOR THE MONTH OF "Dec. 2010"

DATE/RUN			VISUAL INSPECTIONS						PRESSURE GAUGE NORMAL RANGE		MILL WATER SYSTEMS CHECK	NOTES
			VISIBLE EMISSIONS		EXHAUST STACK EMISSIONS		DUST ACCUM.					
	Y	N	Y	N	Y	N	Y	N	Y	N	CHECK	
1	✓			✓		✓		✓	✓		✓	
2	✓											
3												
4												
5												
6												
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Corrective Actions Taken:

D. *Daily Production Reports*

Daily Shredder Report

DATE:	10/15/2010	Operator:	MATT/JUAN
LOCATION:	Simco	Supervisor:	ROGER
SHIFT:	day	Crane Operator	ADOLFO
		Laborers	LUIS
Scheduled Start:	6:30	Scheduled Stop:	16:00
Actual Start:	6:41	Actual Stop:	15:30
Non-Scheduled Hours:		(Total for PM, Maintenance, Lunch, & Equipment Shortage):	
Scheduled Hours:	8.00	Run Time:	6.75
Available Hours:	8.00	Down Time:	1.25

% Availability:	% Utilization	% Down time	Weight (GT) Per Scheduled Hr.	Weight (GT) Per Available Hr.	Weight (GT) Per Running Hr.
100.0%	84.4%	15.6%	103.25	103.25	122.37

15.6%

# Men	Total Man-Hrs
8	64.00

ENTER AVG WEIGHT PER HULK (lbs)
2000
PER GRAPPLE (lbs)
1800

	2 Hr.	4 Hr.	6 Hr.	8 Hr.	10 Hr.	12 Hr.	Total	OUTPUT WEIGHT (GT)
Hulks (#)							117	104.46
Sheet Iron (Grapples)							0	0.00
Stainless (GT)							0	0.00
Other (GT)							0	0.00
Bearing Temp (F)								826.00

Downtime Record					
	Stop	Start	Minutes Lost	Code	Comments
1	6:41 AM	6:48 AM	7		Waiting for crane
2	10:00 AM	10:08 AM	8		Cut ??? On IF
3	10:48 AM	10:59 AM	11		Car chute jam
4	12:00 PM	12:30 PM	30		Lunch
5	3:30 PM				Piece stuck on front of box
6					
7					
8					
9					
10					
	Total (Min. / Hrs. / Diff (Hrs.))		56	0.93	

CODES: INF = Infeed Conveyor; PCK = Picking Conveyor; STA = Stacking Conveyor; FLU = Fluff Conveyor; ELV = Elevating Conveyor; SCA = Scalping Conveyor; SHA = Shaker; FDR = Feed Roll; MAG = Magnet; ELE = Electrical; HYD = Hydraulic; MIL = Mill; SHC = Shock Cylinders; CRA = Crane; LDR = Loader; BAR = Barge Conveyor

	2Hr.	4 Hr.	6 Hr.	8 Hr.	10 Hr.	12 Hr.
Quality						
Density						
Cleanliness						
Productivity						
Copper						

Scale: A (Good) To D (Bad)

COMMENTS: _____

Daily Shredder Report

DATE:	10/18/2010	Operator:	MATT/JUAN
LOCATION:	Simco	Supervisor:	ED
SHIFT:	day	Crane Operator	ADOLFO
		Laborers	LUIS
Scheduled Start:	6:30	Scheduled Stop:	16:00
Actual Start:	6:45	Actual Stop:	17:50
Non-Scheduled Hours:		(Total for PM, Maintenance, Lunch, & Equipment Shortage):	
Scheduled Hours:	8.00	Run Time:	6.75
Available Hours:	8.00	Down Time:	1.25

% Availability:	% Utilization	% Down time	Weight (GT) Per Scheduled Hr.	Weight (GT) Per Available Hr.	Weight (GT) Per Running Hr.
100.0%	84.4%	15.6%	68.75	68.75	81.48

15.6%

# Men	Total Man-Hrs
8	64.00

ENTER AVG WEIGHT PER HULK (lbs)
2000
PER GRAPPLE (lbs)
1800

	2 Hr.	4 Hr.	6 Hr.	8 Hr.	10 Hr.	12 Hr.	Total	OUTPUT WEIGHT (GT)
Hulks (#)							138	123.21
Sheet Iron (Grapples)							0	0.00
Stainless (GT)							0	0.00
Other (GT)							0	0.00
Bearing Temp (F)							EST	550.00

Downtime Record

	Stop	Start	Minutes Lost	Code	Comments
1	6:45 AM	6:53 AM	8		No Crane
2	6:59 AM	7:05 AM	6		2nd Mag Arm Jam
3	9:48 AM	9:00 AM	2		Thermal
4	10:15 AM	10:20 AM	5		Big P2 1st Transfer
5	10:22 AM	12:00 PM	98		Check JB Recurring / Let motor idle shut off motor
6	12:00 PM	12:30 PM	30		Lunch
7	2:16 PM	2:21 PM	2		Thermal
8	3:33 PM	3:40 PM	7		Big P2 1st Transfer
9	3:50 PM	4:00 PM	10		Break
10	5:05 PM	5:11 PM	6		Big Piece
	Total (Min. / Hrs. / Diff (Hrs.))		174	2.90	

CODES: INF = Infeed Conveyor; PCK = Picking Conveyor; STA = Stacking Conveyor; FLU = Fluff Conveyor; ELV = Elevating Conveyor; SCA = Scalping Conveyor; SHA = Shaker; FDR = Feed Roll; MAG = Magnet; ELE = Electrical; HYD = Hydraulic; MIL = Mill; SHC = Shock Cylinders; CRA = Crane; LDR = Loader; BAR = Barge Conveyor

	2Hr.	4 Hr.	6 Hr.	8 Hr.	10 Hr.	12 Hr.
Quality						
Density						
Cleanliness						
Productivity						
Copper						

Scale: A (Good) To D (Bad)

COMMENTS:

Calibrated Scale Before Start
Explotion 3:31
No scale morning 7:03
No scale all day load all broken

Daily Shredder Report

DATE:	10/19/2010	Operator:	MATT/JUAN
LOCATION:	Simco	Supervisor:	ROGER
SHIFT:	day	Crane Operator	ADOLFO
		Laborers	LUIS
Scheduled Start:	6:30	Scheduled Stop:	16:00
Actual Start:	6:42	Actual Stop:	17:50
Non-Scheduled Hours:		(Total for PM, Maintenance, Lunch, & Equipment Shortage):	
Scheduled Hours:	8.00	Run Time:	6.75
Available Hours:	8.00	Down Time:	1.25

% Availability:	% Utilization	% Down time	Weight (GT) Per Scheduled Hr.	Weight (GT) Per Available Hr.	Weight (GT) Per Running Hr.
100.0%	84.4%	15.6%	79.38	79.38	94.07

15.6%

# Men	Total Man-Hrs
8	64.00

ENTER AVG WEIGHT PER HULK (lbs)
2000
PER GRAPPLE (lbs)
1800

	2 Hr.	4 Hr.	6 Hr.	8 Hr.	10 Hr.	12 Hr.	Total	OUTPUT WEIGHT (GT)
Hulks (#)							132	117.86
Sheet Iron (Grapples)							0	0.00
Stainless (GT)							0	0.00
Other (GT)							0	0.00
Bearing Temp (F)							EST	635.00

	Downtime Record				
	Stop	Start	Minutes Lost	Code	Comments
1	6:52 AM	6:55 AM	3		DFR Shutoff
2	8:51 AM	9:16 AM	19		Weld Oil Leak on DFR
3	12:00 PM	12:30 PM	30		Lunch
4	1:05 PM	1:10 PM	5		Big P2 1st Transfer
5	1:20 PM	1:27 PM	7		No crane
6	3:50 PM	4:00 PM	10		Break
7					
8					
9					
10					
	Total (Min. / Hrs. / Diff (Hrs.))		74	1.23	

CODES: INF = Infeed Conveyor; PCK = Picking Conveyor; STA = Stacking Conveyor; FLU = Fluff Conveyor; ELV = Elevating Conveyor; SCA = Scalping Conveyor; SHA = Shaker; FDR = Feed Roll; MAG = Magnet; ELE = Electrical; HYD = Hydraulic; MIL = Mill; SHC = Shock Cylinders; CRA = Crane; LDR = Loader; BAR = Barge Conveyor

	2Hr.	4 Hr.	6 Hr.	8 Hr.	10 Hr.	12 Hr.
Quality						
Density						
Cleanliness						
Productivity						
Copper						

Scale: A (Good) To D (Bad)

COMMENTS: No Scale

Daily Shredder Report

DATE:	10/20/2010	Operator:	MATT/JUAN
LOCATION:	Simco	Supervisor:	ROGER
SHIFT:	day	Crane Operator	ADOLFO
		Laborers	LUIS
Scheduled Start:	6:30	Scheduled Stop:	16:00
Actual Start:	6:46	Actual Stop:	17:35
Non-Scheduled Hours:		(Total for PM, Maintenance, Lunch, & Equipment Shortage):	
Scheduled Hours:	8.00	Run Time:	6.75
Available Hours:	8.00	Down Time:	1.25

% Availability:	% Utilization	% Down time	Weight (GT) Per Scheduled Hr.	Weight (GT) Per Available Hr.	Weight (GT) Per Running Hr.
100.0%	84.4%	15.6%	60.63	60.63	71.85

15.6%

# Men	Total Man-Hrs
8	64.00

ENTER AVG WEIGHT PER HULK (lbs)
2000
PER GRAPPLE (lbs)
1800

	2 Hr.	4 Hr.	6 Hr.	8 Hr.	10 Hr.	12 Hr.	Total	OUTPUT WEIGHT (GT)
Hulks (#)							116	103.57
Sheet Iron (Grapples)							0	0.00
Stainless (GT)							0	0.00
Other (GT)							0	0.00
Bearing Temp (F)							EST	485.00

Downtime Record

	Stop	Start	Minutes Lost	Code	Comments
1	8:19 AM	8:26 AM	7		Car Chute Jam
2	8:31 AM	9:31 AM	60		Mill HPN High Temp
3	9:51 AM	10:46 AM	55		2 box stock/ sorting ripped
4	12:00 PM	12:30 PM	30		lunch
5	2:30 PM	2:35 PM	5		big piece
6	3:28 PM	3:32 PM	4		big piece
7	3:50 PM	4:00 PM	10		break
8	4:09 PM	4:14 PM	5		2nd transfer
9	5:35 PM				broken flights on IF
10					
	Total (Min. / Hrs. / Diff (Hrs.))		176	2.93	

CODES: INF = Infeed Conveyor; PCK = Picking Conveyor; STA = Stacking Conveyor; FLU = Fluff Conveyor; ELV = Elevating Conveyor; SCA = Scalping Conveyor; SHA = Shaker; FDR = Feed Roll; MAG = Magnet; ELE = Electrical; HYD = Hydraulic; MIL = Mill; SHC = Shock Cylinders; CRA = Crane; LOR = Loader; BAR = Barge Conveyor

	2Hr.	4 Hr.	6 Hr.	8 Hr.	10 Hr.	12 Hr.
Quality						
Density						
Cleanliness						
Productivity						
Copper						

Scale: A (Good) To D (Bad)

COMMENTS: Start running skeletor 3:02-3:15
No Scale

Daily Shredder Report

DATE:	10/21/2010	Operator:	MATT/JUAN
LOCATION:	Simco	Supervisor:	ED
SHIFT:	day	Crane Operator	ADOLFO
		Laborers	LUIS
Scheduled Start:	6:30	Scheduled Stop:	16:00
Actual Start:	6:43	Actual Stop:	16:00
Non-Scheduled Hours:		(Total for PM, Maintenance, Lunch, & Equipment Shortage):	
Scheduled Hours:	8.00	Run Time:	6.75
Available Hours:	8.00	Down Time:	1.25

% Availability:	% Utilization	% Down time	Weight (GT) Per Scheduled Hr.	Weight (GT) Per Available Hr.	Weight (GT) Per Running Hr.
100.0%	84.4%	15.6%	74.38	74.38	88.15

15.6%

# Men	Total Man-Hrs
8	64.00

ENTER AVG WEIGHT PER HULK (lbs)
2000
PER GRAPPLE (lbs)
1800

	2 Hr.	4 Hr.	6 Hr.	8 Hr.	10 Hr.	12 Hr.	Total	OUTPUT WEIGHT (GT)
Hulks (#)							111	99.11
Sheet Iron (Grapples)							0	0.00
Stainless (GT)							0	0.00
Other (GT)							0	0.00
Bearing Temp (F)							EST	595.00

	Downtime Record				
	Stop	Start	Minutes Lost	Code	Comments
1	6:43 AM	6:47 AM	4		No Crane
2	7:04 AM	7:08 AM	4		Big Piece
3	10:01 AM	10:07 AM	6		No Crane
4	11:06 AM	11:08 AM	2		Sorting CNVR E Star
5	12:00 PM	12:30 PM	30		Lunch
6	1:03 PM	1:08 PM	5		Big Piece
7					
8					
9					
10					
	Total (Min. / Hrs. / Diff (Hrs.))		51	0.85	

CODES: INF = Infeed Conveyor; PCK = Picking Conveyor; STA = Stacking Conveyor; FLU = Fluff Conveyor; ELV = Elevating Conveyor; SCA = Scalping Conveyor; SHA = Shaker; FDR = Feed Roll; MAG = Magnet; ELE = Electrical; HYD = Hydraulic; MIL = Mill; SHC = Shock Cylinders; CRA = Crane; LDR = Loader; BAR = Barge Conveyor

	2Hr.	4 Hr.	6 Hr.	8 Hr.	10 Hr.	12 Hr.
Quality						
Density						
Cleanliness						
Productivity						
Copper						

Scale: A (Good) To D (Bad)

COMMENTS: _____

Daily Shredder Report

DATE:	10/22/2010	Operator:	MATT/JUAN
LOCATION:	Simco	Supervisor:	ED
SHIFT:	day	Crane Operator	ADOLFO
		Laborers	LUIS
Scheduled Start:	6:30	Scheduled Stop:	16:00
Actual Start:	6:42	Actual Stop:	16:00
Non-Scheduled Hours:		(Total for PM, Maintenance, Lunch, & Equipment Shortage):	4.00
Scheduled Hours:	8.00	Run Time:	3.50
Available Hours:	3.00	Down Time:	4.50

% Availability:	% Utilization	% Down time	Weight (GT) Per Scheduled Hr.	Weight (GT) Per Available Hr.	Weight (GT) Per Running Hr.
37.5%	116.7%	150.0%	37.13	99.00	84.86

150.0%

# Men	Total Man-Hrs
8	64.00

ENTER AVG WEIGHT PER HULK (lbs)
2000
PER GRAPPLE (lbs)
1800

	2 Hr.	4 Hr.	6 Hr.	8 Hr.	10 Hr.	12 Hr.	Total	OUTPUT WEIGHT (GT)
Hulks (#)							96	85.71
Sheet Iron (Grapples)							0	0.00
Stainless (GT)							0	0.00
Other (GT)							0	0.00
Bearing Temp (F)							EST	297.00

Downtime Record

	Stop	Start	Minutes Lost	Code	Comments
1	6:50 AM	10:50 AM	240		Big Piece / Change 5 Hammers/ 2 end disc caps
2	12:00 PM	12:30 PM	30		Lunch
3					
4					
5					
6					
7					
8					
9					
10					
	Total (Min. / Hrs. / Diff (Hrs.))		270	4.50	

CODES: INF = Infeed Conveyor; PCK = Picking Conveyor; STA = Stacking Conveyor; FLU = Fluff Conveyor; ELV = Elevating Conveyor; SCA = Scalping Conveyor; SHA = Shaker; FDR = Feed Roll; MAG = Magnet; ELE = Electrical; HYD = Hydraulic; MIL = Mill; SHC = Shock Cylinders; CRA = Crane; LDR = Loader; BAR = Barge Conveyor

	2Hr.	4 Hr.	6 Hr.	8 Hr.	10 Hr.	12 Hr.
Quality						
Density						
Cleanliness						
Productivity						
Copper						

Scale: A (Good) To D (Bad)

COMMENTS: Car Explotion 1:38

Daily Shredder Report

DATE:	10/25/2010	Operator:	MATT/JUAN
LOCATION:	Simco	Supervisor:	ED
SHIFT:	day	Crane Operator	ADOLFO
		Laborers	LUIS
Scheduled Start:	6:30	Scheduled Stop:	18:00
Actual Start:	6:49	Actual Stop:	17:50
Non-Scheduled Hours:		(Total for PM, Maintenance, Lunch, & Equipment Shortage):	2.10
Scheduled Hours:	13.00	Run Time:	8.00
Available Hours:	10.90	Down Time:	2.72

% Availability:	% Utilization	% Down time	Weight (GT) Per Scheduled Hr.	Weight (GT) Per Available Hr.	Weight (GT) Per Running Hr.
83.8%	73.4%	25.0%	54.62	65.14	88.75

25.0%

# Men	Total Man-Hrs
8	104.00

ENTER AVG WEIGHT PER HULK (lbs)
2000
PER GRAPPLE (lbs)
1800

	2 Hr.	4 Hr.	6 Hr.	8 Hr.	10 Hr.	12 Hr.	Total	OUTPUT WEIGHT (GT)
Hulks (#)							192	171.43
Sheet Iron (Grapples)							0	0.00
Stainless (GT)							0	0.00
Other (GT)							0	0.00
Bearing Temp (F)							EST	710.00

Downtime Record

	Stop	Start	Minutes Lost	Code	Comments
1	8:55 AM	9:05 AM	10		Tighten liner bolts
2	11:55 AM	12:00 PM	5		Big Piece/broken hammer
3	12:00 PM	12:30 PM	30		Lunch
4	12:30 PM	2:06 PM	96		Change Hammer
5	2:35 PM	2:47 PM	12		Check
6	3:50 PM	4:00 PM	10		Break
7					
8					
9					
10					
	Total (Min. / Hrs. / Diff (Hrs.))		163	2.72	

CODES: INF = Infeed Conveyor; PCK = Picking Conveyor; STA = Stacking Conveyor; FLU = Fluff Conveyor; ELV = Elevating Conveyor; SCA = Scalping Conveyor; SHA = Shaker; FDR = Feed Roll; MAG = Magnet; ELE = Electrical; HYD = Hydraulic; MIL = Mill; SHC = Shock Cylinders; CRA = Crane; LDR = Loader; BAR = Barge Conveyor

	2Hr.	4 Hr.	6 Hr.	8 Hr.	10 Hr.	12 Hr.
Quality						
Density						
Cleanliness						
Productivity						
Copper						

Scale: A (Good) To D (Bad)

COMMENTS: Filled Rheostat befroe start
Scale guy here to fix scale

Daily Shredder Report

DATE:	10/26/2010	Operator:	MATT/JUAN
LOCATION:	Simco	Supervisor:	ED
SHIFT:	day	Crane Operator	ADOLFO
		Laborers	LUIS
Scheduled Start:	6:30	Scheduled Stop:	16:00
Actual Start:	6:43	Actual Stop:	18:00
Non-Scheduled Hours:		(Total for PM, Maintenance, Lunch, & Equipment Shortage):	0.50
Scheduled Hours:	9.00	Run Time:	6.75
Available Hours:	8.50	Down Time:	0.80

% Availability:	% Utilization	% Down time	Weight (GT) Per Scheduled Hr.	Weight (GT) Per Available Hr.	Weight (GT) Per Running Hr.
94.4%	79.4%	9.4%	79.89	84.59	106.52

9.4%

# Men	Total Man-Hrs
8	72.00

ENTER AVG WEIGHT PER HULK (lbs)
2000
PER GRAPPLE (lbs)
1800

	2 Hr.	4 Hr.	6 Hr.	8 Hr.	10 Hr.	12 Hr.	Total	OUTPUT WEIGHT (GT)
Hulks (#)							125	111.61
Sheet Iron (Grapples)							0	0.00
Stainless (GT)							0	0.00
Other (GT)							0	0.00
Bearing Temp (F)							ADJ	719.00

Downtime Record

	Stop	Start	Minutes Lost	Code	Comments
1	11:25 AM	11:33 AM	8		Big P2 1st Transfer
2	12:00 PM	12:30 PM	30		Lunch
3	5:30 PM	5:40 PM	10		2nd Transfer running out of track
4					
5					
6					
7					
8					
9					
10					
	Total (Min. / Hrs. / Diff (Hrs.))		48	0.80	

CODES: INF = Infeed Conveyor; PCK = Picking Conveyor; STA = Stacking Conveyor; FLU = Fluff Conveyor; ELV = Elevating Conveyor; SCA = Scalping Conveyor; SHA = Shaker; FDR = Feed Roll; MAG = Magnet; ELE = Electrical; HYD = Hydraulic; MIL = Mill; SHC = Shock Cylinders; CRA = Crane; LDR = Loader; BAR = Barge Conveyor

	2Hr.	4 Hr.	6 Hr.	8 Hr.	10 Hr.	12 Hr.
Quality						
Density						
Cleanliness						
Productivity						
Copper						

Scale: A (Good) To D (Bad)

COMMENTS: Start run skeletor 3:00-3:16

Daily Shredder Report

DATE:	10/27/2010	Operator:	MATT/JUAN
LOCATION:	Simco	Supervisor:	ED
SHIFT:	day	Crane Operator	ADOLFO
		Laborers	LUIS
Scheduled Start:	6:30	Scheduled Stop:	18:00
Actual Start:	6:45	Actual Stop:	17:50
Non-Scheduled Hours:		(Total for PM, Maintenance, Lunch, & Equipment Shortage):	1.50
Scheduled Hours:	9.00	Run Time:	6.75
Available Hours:	7.50	Down Time:	1.25

% Availability:	% Utilization	% Down time	Weight (GT) Per Scheduled Hr.	Weight (GT) Per Available Hr.	Weight (GT) Per Running Hr.
83.3%	90.0%	16.7%	73.11	87.73	97.48

16.7%

# Men	Total Man-Hrs
8	72.00

ENTER AVG WEIGHT PER HULK (lbs)
2000
PER GRAPPLE (lbs)
1800

	2 Hr.	4 Hr.	6 Hr.	8 Hr.	10 Hr.	12 Hr.	Total	OUTPUT WEIGHT (GT)
Hulks (#)							196	175.00
Sheet Iron (Grapples)							0	0.00
Stainless (GT)							0	0.00
Other (GT)							0	0.00
Bearing Temp (F)								658.00

Downtime Record

	Stop	Start	Minutes Lost	Code	Comments
1	6:57 AM	7:05 AM	8		Stop 1st Transfer
2	7:22 AM	8:40 AM	78		Stop 1st Transfer / Track belt
3	10:46 AM	10:53 AM	7		2nd Transfer
4	11:09 AM	11:12 AM	3		Big Piece
5	12:00 PM	12:30 PM	30		Lunch
6	12:41 PM	12:55 PM	14		2nd Transfer Track
7	1:31 PM	1:39 PM	8		Car Chute Jam
8	2:15 PM	2:16 PM	1		Big Piece
9	2:34 PM	2:40 PM	6		2nd Transfer Track
10	3:50 PM	4:00 PM	10		Break
11	4:50 PM	4:52 PM	2		Thermal
	Total (Min. / Hrs. / Diff (Hrs.))		167	2.78	

CODES: INF = Infeed Conveyor; PCK = Picking Conveyor; STA = Stacking Conveyor; FLU = Fluff Conveyor; ELV = Elevating Conveyor; SCA = Scalping Conveyor; SHA = Shaker; FDR = Feed Roll; MAG = Magnet; ELE = Electrical; HYD = Hydraulic; MIL = Mill; SHC = Shock Cylinders; CRA = Crane; LDR = Loader; BAR = Barge Conveyor

	2Hr.	4 Hr.	6 Hr.	8 Hr.	10 Hr.	12 Hr.
Quality						
Density						
Cleanliness						
Productivity						
Copper						

Scale: A (Good) To D (Bad)

COMMENTS: _____

Daily Shredder Report

DATE:	10/28/2010	Operator:	MATT/JUAN
LOCATION:	Simco	Supervisor:	ED
SHIFT:	day	Crane Operator	ADOLFO
		Laborers	LUIS
Scheduled Start:	6:30	Scheduled Stop:	16:00
Actual Start:	7:41	Actual Stop:	15:22
Non-Scheduled Hours:		(Total for PM, Maintenance, Lunch, & Equipment Shortage):	0.50
Scheduled Hours:	9.00	Run Time:	6.75
Available Hours:	8.50	Down Time:	1.25

% Availability:	% Utilization	% Down time	Weight (GT) Per Scheduled Hr.	Weight (GT) Per Available Hr.	Weight (GT) Per Running Hr.
94.4%	79.4%	14.7%	65.11	68.94	86.81

14.7%

# Men	Total Man-Hrs
8	72.00

ENTER AVG WEIGHT PER HULK (lbs)
2000
PER GRAPPLE (lbs)
1800

	2 Hr.	4 Hr.	6 Hr.	8 Hr.	10 Hr.	12 Hr.	Total	OUTPUT WEIGHT (GT)
Hulks (#)							0	0.00
Sheet Iron (Grapples)							0	0.00
Stainless (GT)							0	0.00
Other (GT)							0	0.00
Bearing Temp (F)							ADJ	586.00

Downtime Record

	Stop	Start	Minutes Lost	Code	Comments
1	10:18 AM	10:20 AM	2		Car tonage stuck
2	12:00 PM	12:30 PM	30		Lunch
3	1:02 PM	1:07 PM	5		Car Chute Jam
4	1:51 PM	1:58 PM	7		Vibrator #2
5	2:00 PM	2:50 PM	7		Big P2 1st Transfer
6	3:08 PM	3:13 PM	5		Big P2 1st Transfer
7	3:22 PM				1st Non Ferrous running out/ ripped Changed Belt
8					
9					
10					
	Total (Min. / Hrs. / Diff (Hrs.))		56	0.93	

CODES: INF = Infeed Conveyor; PCK = Picking Conveyor; STA = Stacking Conveyor; FLU = Fluff Conveyor; ELV = Elevating Conveyor; SCA = Scalping Conveyor; SHA = Shaker; FDR = Feed Roll; MAG = Magnet; ELE = Electrical; HYD = Hydraulic; MIL = Mill; SHC = Shock Cylinders; CRA = Crane; LDR = Loader; BAR = Barge Conveyor

	2Hr.	4 Hr.	6 Hr.	8 Hr.	10 Hr.	12 Hr.
Quality						
Density						
Cleanliness						
Productivity						
Copper						

Scale: A (Good) To D (Bad)

COMMENTS: Worked on 2nd transfer before start
shut down mill 3:28
Car Explosion 10:34

Daily Shredder Report

DATE:	10/29/2010	Operator:	MATT/JUAN
LOCATION:	Simco	Supervisor:	ED
SHIFT:	day	Crane Operator	ADOLFO
		Laborers	LUIS
Scheduled Start:	6:30	Scheduled Stop:	16:00
Actual Start:	6:42	Actual Stop:	15:50
Non-Scheduled Hours:		(Total for PM, Maintenance, Lunch, & Equipment Shortage):	1.50
Scheduled Hours:	8.00	Run Time:	6.50
Available Hours:	6.50	Down Time:	1.25

% Availability:	% Utilization	% Down time	Weight (GT) Per Scheduled Hr.	Weight (GT) Per Available Hr.	Weight (GT) Per Running Hr.
81.3%	100.0%	19.2%	66.00	81.23	81.23

19.2%

# Men	Total Man-Hrs
8	64.00

ENTER AVG WEIGHT PER HULK (lbs)
2000
PER GRAPPLE (lbs)
1800

	2 Hr.	4 Hr.	6 Hr.	8 Hr.	10 Hr.	12 Hr.	Total	OUTPUT WEIGHT (GT)
Hulks (#)							192	171.43
Sheet Iron (Grapples)							0	0.00
Stainless (GT)							0	0.00
Other (GT)							0	0.00
Bearing Temp (F)							ADJ	528.00

Downtime Record

	Stop	Start	Minutes Lost	Code	Comments
1	7:21 AM	7:24 AM	3		Check oil leak
2	7:27 AM	7:35 AM	8		2nd transfer jam
3	8:21 AM	8:27 AM	6		Big Piece
4	10:10 AM	12:00 AM	5		No Crane
5	11:43 AM	1:28 PM	105		Clear Belts for zorba / Run Zorba / Lunch/ Clear Bin
6	2:32 PM	2:41 PM	11		2nd Transfer
7	3:00 PM	3:03 PM	3		Car Chute Jam
8					
9					
10					
	Total (Min. / Hrs. / Diff (Hrs.))		141	2.35	

CODES: INF = Infeed Conveyor; PCK = Picking Conveyor; STA = Stacking Conveyor; FLU = Fluff Conveyor; ELV = Elevating Conveyor; SCA = Scalping Conveyor; SHA = Shaker; FDR = Feed Roll; MAG = Magnet; ELE = Electrical; HYD = Hydraulic; MIL = Mill; SHC = Shock Cylinders; CRA = Crane; LDR = Loader; BAR = Barge Conveyor

	2Hr.	4 Hr.	6 Hr.	8 Hr.	10 Hr.	12 Hr.
Quality						
Density						
Cleanliness						
Productivity						
Copper						

Scale: A (Good) To D (Bad)

COMMENTS: Start wash Zorba 12:30-13:06

Daily Shredder Report

DATE:	11/2/2010	Operator:	MATT/JUAN
LOCATION:	Simco	Supervisor:	ED
SHIFT:	day	Crane Operator	ADOLFO
		Laborers	LUIS
Scheduled Start:	6:30	Scheduled Stop:	16:00
Actual Start:	7:40	Actual Stop:	18:50
Non-Scheduled Hours:		(Total for PM, Maintenance, Lunch, & Equipment Shortage):	3.50
Scheduled Hours:	9.00	Run Time:	5.50
Available Hours:	5.50	Down Time:	3.93

% Availability:	% Utilization	% Down time	Weight (GT) Per Scheduled Hr.	Weight (GT) Per Available Hr.	Weight (GT) Per Running Hr.
61.1%	100.0%	71.5%	66.44	108.73	108.73

71.5%

# Men	Total Man-Hrs
8	72.00

ENTER AVG WEIGHT PER HULK (lbs)
2000
PER GRAPPLE (lbs)
1800

	2 Hr.	4 Hr.	6 Hr.	8 Hr.	10 Hr.	12 Hr.	Total	OUTPUT WEIGHT (GT)
Hulks (#)							193	172.32
Sheet Iron (Grapples)							0	0.00
Stainless (GT)							0	0.00
Other (GT)							0	0.00
Bearing Temp (F)								598.00

Downtime Record

	Stop	Start	Minutes Lost	Code	Comments
1	7:47 AM	7:53 AM	8		2nd transfer track. Under rail
2	8:17 AM	8:24 AM	7		Big piece
3	10:41 AM	11:51 AM	70		Change RTD on o/b R3D brng / motor shut down
4	12:00 PM	12:30 PM	30		lunch
5	12:48 PM	2:00 PM	72		changed wire leading to OB RTD
6	3:39 PM	4:22 PM	43		Fix mill HPU
7	6:26 PM	6:32 PM	6		Stop 1st Transfer
8					
9					
10					
	Total (Min. / Hrs. / Diff (Hrs.))		236	3.93	

CODES: INF = Infeed Conveyor; PCK = Picking Conveyor; STA = Stacking Conveyor; FLU = Fluff Conveyor; ELV = Elevating Conveyor; SCA = Scalping Conveyor; SHA = Shaker; FDR = Feed Roll; MAG = Magnet; ELE = Electrical; HYD = Hydraulic; MIL = Mill; SHC = Shock Cylinders; CRA = Crane; LDR = Loader; BAR = Barge Conveyor

	2Hr.	4 Hr.	6 Hr.	8 Hr.	10 Hr.	12 Hr.
Quality						
Density						
Cleanliness						
Productivity						
Copper						

Scale: A (Good) To D (Bad)

COMMENTS: Welded leak on DFR under car chute and washed windows
New Hammers

Daily Shredder Report

DATE:	11/3/2010	Operator:	MATT/JUAN
LOCATION:	Simco	Supervisor:	ED
SHIFT:	day	Crane Operator	ADOLFO
		Laborers	LUIS
Scheduled Start:	6:30	Scheduled Stop:	19:00
Actual Start:	6:43	Actual Stop:	18:50
Non-Scheduled Hours:		(Total for PM, Maintenance, Lunch, & Equipment Shortage):	1.00
Scheduled Hours:	12.50	Run Time:	10.22
Available Hours:	11.50	Down Time:	1.28

% Availability:	% Utilization	% Down time	Weight (GT) Per Scheduled Hr.	Weight (GT) Per Available Hr.	Weight (GT) Per Running Hr.
92.0%	88.9%	11.1%	61.52	66.87	75.24

11.1%

# Men	Total Man-Hrs
8	100.00

ENTER AVG WEIGHT PER HULK (lbs)
2000
PER GRAPPLE (lbs)
1800

	2 Hr.	4 Hr.	6 Hr.	8 Hr.	10 Hr.	12 Hr.	Total	OUTPUT WEIGHT (GT)
Hulks (#)							257	229.46
Sheet Iron (Grapples)							0	0.00
Stainless (GT)							0	0.00
Other (GT)							0	0.00
Bearing Temp (F)							ADJ	769.00

Downtime Record

	Stop	Start	Minutes Lost	Code	Comments
1	8:05 AM	8:11 AM	6.00		Check OB RTR Brng RTD - Tighten connections
2	10:15 AM	10:19 AM	4		Big Piece
3	10:56 AM	11:00 AM	4		Big Piece
4	12:00 PM	12:30 PM	30		Lunch
5	2:19 PM	2:31 PM	12		2nd Tansfer out rail
6	2:42 PM	2:53 PM	1		2nd Tansfer out rail
7	3:50 PM	4:00 PM	10		Break
8	4:26 PM	4:30 PM	4		Track 2nd transfer
9	6:05 PM	6:11 PM	6		Big Piece
10					
	Total (Min. / Hrs. / Diff (Hrs.))		77	1.28	

CODES: INF = Infeed Conveyor; PCK = Picking Conveyor; STA = Stacking Conveyor; FLU = Fluff Conveyor; ELV = Elevating Conveyor; SCA = Scalping Conveyor; SHA = Shaker; FDR = Feed Roll; MAG = Magnet; ELE = Electrical; HYD = Hydraulic; MIL = Mill; SHC = Shock Cylinders; CRA = Crane; LDR = Loader; BAR = Barge Conveyor

	2Hr.	4 Hr.	6 Hr.	8 Hr.	10 Hr.	12 Hr.
Quality						
Density						
Cleanliness						
Productivity						
Copper						

Scale: A (Good) To D (Bad)

COMMENTS: 8:50 - Car Explosion

Daily Shredder Report

DATE:	11/4/2010	Operator:	MATT/JUAN
LOCATION:	Simco	Supervisor:	ED
SHIFT:	day	Crane Operator	ADOLFO
		Laborers	LUIS
Scheduled Start:	6:30	Scheduled Stop:	19:00
Actual Start:	6:52	Actual Stop:	18:50
Non-Scheduled Hours:		(Total for PM, Maintenance, Lunch, & Equipment Shortage):	1.25
Scheduled Hours:	12.50	Run Time:	9.45
Available Hours:	11.25	Down Time:	1.80

% Availability:	% Utilization	% Down time	Weight (GT) Per Scheduled Hr.	Weight (GT) Per Available Hr.	Weight (GT) Per Running Hr.
90.0%	84.0%	16.0%	67.84	75.38	89.74

16.0%

# Men	Total Man-Hrs
8	100.00

ENTER AVG WEIGHT PER HULK (lbs)
2000
PER GRAPPLE (lbs)
1800

	2 Hr.	4 Hr.	6 Hr.	8 Hr.	10 Hr.	12 Hr.	Total	OUTPUT WEIGHT (GT)
Hulks (#)							201	179.46
Sheet Iron (Grapples)							0	0.00
Stainless (GT)							0	0.00
Other (GT)							0	0.00
Bearing Temp (F)							ADJ	848.00

Downtime Record

	Stop	Start	Minutes Lost	Code	Comments
1	7:29 AM	7:46 AM	17		Big piece
2	10:34 AM	10:36 AM	2		Thermal
3	11:44 AM	11:49 AM	5		2nd mag vibrator trap
4	12:00 PM	12:30 PM	30		Lunch
5	12:30 PM	12:56 PM	26		2nd mag drum shaker table
6	1:13 PM	1:16 PM	3		Big P2 1st transfer
7	3:22 PM	3:33 PM	11		2nd Transfer
8	3:50 PM	4:00 PM	10		Break
9	5:36 PM	5:40 PM	4		Big piece
10			0		
	Total (Min. / Hrs. / Diff (Hrs.))		108	1.80	

CODES: INF = Infeed Conveyor; PCK = Picking Conveyor; STA = Stacking Conveyor; FLU = Fluff Conveyor; ELV = Elevating Conveyor; SCA = Scalping Conveyor; SHA = Shaker; FDR = Feed Roll; MAG = Magnet; ELE = Electrical; HYD = Hydraulic; MIL = Mill; SHC = Shock Cylinders; CRA = Crane; LDR = Loader; BAR = Barge Conveyor

	2Hr.	4 Hr.	6 Hr.	8 Hr.	10 Hr.	12 Hr.
Quality						
Density						
Cleanliness						
Productivity						
Copper						

Scale: A (Good) To D (Bad)

COMMENTS: Cleaned car chute out before start
8:32 Explosion - Bundle

Daily Shredder Report

DATE:	11/5/2010	Operator:	MATT/JUAN
LOCATION:	Simco	Supervisor:	ED
SHIFT:	day	Crane Operator	ADOLFO
		Laborers	LUIS
Scheduled Start:	6:30	Scheduled Stop:	16:00
Actual Start:	6:50	Actual Stop:	15:50
Non-Scheduled Hours:		(Total for PM, Maintenance, Lunch, & Equipment Shortage):	1.00
Scheduled Hours:	9.50	Run Time:	7.12
Available Hours:	8.50	Down Time:	1.38

% Availability:	% Utilization	% Down time	Weight (GT) Per Scheduled Hr.	Weight (GT) Per Available Hr.	Weight (GT) Per Running Hr.
89.5%	83.8%	16.2%	61.05	68.24	81.46

16.2%

# Men	Total Man-Hrs
8	76.00

ENTER AVG WEIGHT PER HULK (lbs)
2000
PER GRAPPLE (lbs)
1800

	2 Hr.	4 Hr.	6 Hr.	8 Hr.	10 Hr.	12 Hr.	Total	OUTPUT WEIGHT (GT)
Hulks (#)							110	98.21
Sheet Iron (Grapples)							0	0.00
Stainless (GT)							0	0.00
Other (GT)							0	0.00
Bearing Temp (F)								580.00

	Downtime Record				
	Stop	Start	Minutes Lost	Code	Comments
1	7:07 AM	7:14 AM	7		Big Piece
2	8:01 AM	8:07 AM	6		2nd transfer jam
3	9:18 AM	9:23 AM	5		2nd transfer jam
4	9:34 AM	9:39 AM	5		stacker plugged
5	11:00 AM	11:08 AM	8		let clear for skeletor
6	11:10 AM	11:12 AM	2		clear out skeletors
7	11:47 AM	11:50 AM	3		Big Piece
8	12:00 PM	12:30 PM	30		lunch
9	1:30 PM	1:36 PM	6		big p2 1st transfer
10	2:14 PM	2:20 PM	6		no crane
11	2:30 PM	2:35 PM	5		stacking chute jam
	Total (Min. / Hrs. / Diff (Hrs.))		83	1.38	

: Stacking Conveyor; FLU = Fluff Conveyor; ELV = Elevating Conveyor; SCA = Scalping Conveyor;
SHA = Shaker; FDR = Feed Roll; MAG = Magnet; ELE = Electrical; HYD = Hydraulic; MIL = Mill;
SHC = Shock Cylinders; CRA = Crane; LDR = Loader; BAR = Barge Conveyor

	2Hr.	4 Hr.	6 Hr.	8 Hr.	10 Hr.	12 Hr.
Quality						
Density						
Cleanliness						
Productivity						
Copper						

Scale: A (Good) To D (Bad)

COMMENTS: washed windows before start
skeletors 11:05-11:10
shut down mill motor 3:20

DAILY SHREDDER REPORT

DATE:	12/2/2010	Operator:	MATT/JUAN
LOCATION:	SIMCO	Supervisor:	BRETT
SHIFT:	DAY	Crane Operator	ADOLFO
		Laborers	LUIS
Scheduled Start:	6:30	Scheduled Stop:	16:00
Actual Start:	6:39	Actual Stop:	17:50
Non-Scheduled Hours:		(Total for PM, Maintenance, Lunch, & Equipment Shortage):	
Scheduled Hours:	9.50	Run Time:	6.53
Available Hours:	9.50	Down Time:	2.97

% Availability:	% Utilization	% Down time	Weight (GT) Per Scheduled Hr.	Weight (GT) Per Available Hr.	Weight (GT) Per Running Hr.
100.0%	68.7%	31.3%	89.16	89.16	129.71

31.3%

# Men	Total Man-Hrs
8	76.00

ENTER AVG WEIGHT PER HULK (lbs)
2000
PER GRAPPLE (lbs)
1800

	2 Hr.	4 Hr.	6 Hr.	8 Hr.	10 Hr.	12 Hr.	Total	OUTPUT WEIGHT (GT)
Hulks (#)							63	56.25
Sheet Iron (Grapples)							0	0.00
Stainless (GT)							0	0.00
Other (GT)							0	0.00
Bearing Temp (F)								847.00

Downtime Record

	Stop	Start	Minutes Lost	Code	Comments
1	6:39 AM	6:47 AM	8		No Crane
2	8:02 AM	8:02 AM	0		Mag chute Jam
3	8:00 AM	8:45 AM	45		clear out for skeletons
4	9:00 AM	9:02 AM	2		let skeletons
5	11:13 AM	12:00 PM	47		Big p2 1st transfer
6	12:00 PM	12:30 PM	30		lunch
7	1:02 PM	1:09 PM	7		Big p2 1st transfer
8	2:37 PM	2:41 PM	4		stop for camera guys
9	2:38 PM	3:00 PM	22		thermal
10	3:50 PM	4:00 PM	10		break
11	4:10 PM	4:13 PM	3		check feedroll
	Total (Min. / Hrs. / Diff (Hrs.))		178	2.97	

: Stacking Conveyor; FLU = Fluff Conveyor; ELV = Elevating Conveyor; SCA = Scalping Conveyor;
SHA = Shaker; FDR = Feed Roll; MAG = Magnet; ELE = Electrical; HYD = Hydraulic; MIL = Mill;
SHC = Shock Cylinders; CRA = Crane; LDR = Loader; BAR = Barge Conveyor

	2Hr.	4 Hr.	6 Hr.	8 Hr.	10 Hr.	12 Hr.
Quality						
Density						
Cleanliness						
Productivity						
Copper						

Scale: A (Good) To D (Bad)

COMMENTS: skeletons 8:40-9:00

DAILY SHREDDER REPORT

DATE:	12/3/2010	Operator:	MATT/JUAN
LOCATION:	SIMCO	Supervisor:	BRETT
SHIFT:	DAY	Crane Operator	ADOLFO
		Laborers	LUIS
Scheduled Start:	6:30	Scheduled Stop:	16:00
Actual Start:	6:43	Actual Stop:	17:50
Non-Scheduled Hours:		(Total for PM, Maintenance, Lunch, & Equipment Shortage):	
Scheduled Hours:	9.50	Run Time:	8.60
Available Hours:	9.50	Down Time:	0.90

% Availability:	% Utilization	% Down time	Weight (GT) Per Scheduled Hr.	Weight (GT) Per Available Hr.	Weight (GT) Per Running Hr.
100.0%	90.5%	9.5%	92.11	92.11	101.74

9.5%

# Men	Total Man-Hrs
8	76.00

ENTER AVG WEIGHT PER HULK (lbs)
2000
PER GRAPPLE (lbs)
1800

	2 Hr.	4 Hr.	6 Hr.	8 Hr.	10 Hr.	12 Hr.	Total	OUTPUT WEIGHT (GT)
Hulks (#)							122	108.93
Sheet Iron (Grapples)							0	0.00
Stainless (GT)							0	0.00
Other (GT)							0	0.00
Bearing Temp (F)								875.00

Downtime Record

	Stop	Start	Minutes Lost	Code	Comments
1	8:39 AM	8:41 AM	2		DFR Shut off / Reset breaker
2	10:29 AM	10:33 AM	4		Pull heavy out of car chute
3	11:11 AM	11:15 AM	4		Big piece
4	12:00 PM	12:30 PM	30		Lunch
5	3:50 PM	4:00 PM	10		Break
6	5:32 PM	5:36 PM	4		Big piece
7			0		
8			0		
9			0		
10			0		
	Total (Min. / Hrs. / Diff (Hrs.))		54	0.90	

CODES: INF = Infeed Conveyor; PCK = Picking Conveyor; STA = Stacking Conveyor; FLU = Fluff Conveyor; ELV = Elevating Conveyor; SCA = Scalping Conveyor; SHA = Shaker; FDR = Feed Roll; MAG = Magnet; ELE = Electrical; HYD = Hydraulic; MIL = Mill; SHC = Shock Cylinders; CRA = Crane; LDR = Loader; BAR = Barge Conveyor

	2Hr.	4 Hr.	6 Hr.	8 Hr.	10 Hr.	12 Hr.
Quality						
Density						
Cleanliness						
Productivity						
Copper						

Scale: A (Good) To D (Bad)

COMMENTS: 10:34 explosion- propane
14:00 explosion- propane

E. *PSCAA Inspection Report*

Puget Sound Clean Air Agency
1904 3rd Ave #105
Seattle, WA 98101

Facility: Seattle Iron & Metals Corp

Reg #: 17104

On 12/2/10 I conducted an unannounced on-site inspection of this source with EPA Compliance Officer (storm water), Derek Schruhl (shruhl.derek@epa.gov). Upon entry another EPA employee, Chris Hall, set up and started air samples at the facility. Our inspection objective was to conduct a routine compliance inspection with an additional objective to document source conditions in conjunction with EPA air sampling. EPA has taken samples on these prior dates as well: Oct 19, 20, 21, 28, 29, and Nov 3 and 4, 2010.

We met Mr. Ed Armstrong and Mr. John Franklin. I gave them my business card wearing ID. We updated contacts on file. I gave Mr. Franklin and Mr. Schruhl a copy of my Evaluation Report. We went over this process information:

1) Source operates M-F and some Sat from 0630 (typically start the shredder at 0700 or 0715) to 1700. Due to more material accumulated on site (and a barge incoming tonight) they are running until 1800 today.
2) They shut down for a lunch break daily from 1200 to 1230. Other shutdowns occur for repairs. They try to limit these to 15 to 20 minutes at a time and less than 1 hour per day. Daily Production Reports show hours of operation and production data with any notations for down times. See CSR request for Daily Production Reports for periods including EPA sampling dates.
3) A maintenance crew works daily from 1600 to 0030.
4) They feed a mix to the shredder such as 1 car, then 1 bundle (baled appliances, hoods, fenders, etc), and then loose material. If they shred car after car after car then the shredder heats up, the motor works harder, and volatile oils from the cars can cause smoke. Mixing the incoming feed can reduce emissions and lengthen the life of the shredder. They may run just bundles or loose materials depending on need, which would also protect the shredder.

5) They have water sprays on the shredder running at 20 to 60 gpm (on average about 30 gpm). They have an additional 500 gallon deluge system for any fires or explosions.
6) They have an interlock from the shredder motor to the conveyor where if the shredder is over-filled or jammed as indicated by increased "rpm" of the motor, then the conveyor stops.
7) The incoming barge contains Plate and Structural (PNS) material from Alaska. Examples of this material are I-beams, H-beams, and channels.

I advised that I saw a fine orange brown residue on the street at the entrance and exit of the facility. It appeared to be trackout from the site. I expressed concern that this material could kick up into the air with vehicle traffic. Mr. Armstrong said that they own a sweeper and sweep every night. The sweeper uses vacuum, water, and brushes. He checked for sweeping the night before and found that it had been missed as the driver was tied up at Boeing. See CSR note to continue to implement fugitive dust management and controls.

Mr. Armstrong said they just cleaned the roofs and gutters. See attached invoice from Davids Roof Cleaning and Repair to show this work on 11/12/10. He said they had not done any roof cleaning for the past 10 years of their occupancy at this site.

We went out into the yard and observed the shredder in operation. Steam came off over the shredder where water sprays were located. A crane was loading material to the conveyor.

We saw the baghouse from a distance as safe closer access was limited with the shredder in operation. They said they empty the 55 gallon drum at the base of the baghouse about every 5 months and it is only about 1/3 full each time. I could see a magnehelic gauge on the baghouse unit.

See attached O&M logs for the shredder for Oct, Nov, and Dec 2010. Mr. Armstrong reviewed these logs and indicated they had run the shredder on each date that EPA has sampled. Daily Production logs (requested) will show more information on how much material was processed and the extent of any downtime for these dates.

Mr. Armstrong then had to leave for a doctor's appointment. Mr. Franklin described their stormwater handling at the facility. They put in a new pre-

treatment system in September 2010 that has a Vortex grit solids separator through a spinning centrifuge and oil water separator with coalescing plates. This is in 4 blue tanks near the facility entrance and loading docks. Water from catch basins goes to an underground detention tank, pretreatment, and DAF system. They add chemical coagulants and caustic for pH adjustment. They skim off floating solids. Water drops over a weir and goes to tertiary polishing filters (garnet, fine sand, charcoal) before discharge. They have an NPDES permit with Ecology. They also put filter socks in catch basins for best management practices.

We walked around the yard and looked at their water treatment and outfall to the Duwamish (rising tide, so it was closed off). Mr. Schruhl took photos.

At the conclusion of the inspection I issued a CSR for more information in 10 days:

1) *Please submit Daily Production Reports for Oct 15 – 30, Nov 2-5, and Dec 2-3, 2010 (Reg I Art 5)*
2) *Continue to implement fugitive dust controls (Reg I 9.15)*

Mr. Franklin made a copies of my CSR and all attachments (roof cleaning and O&M logs) for Mr. Schruhl.

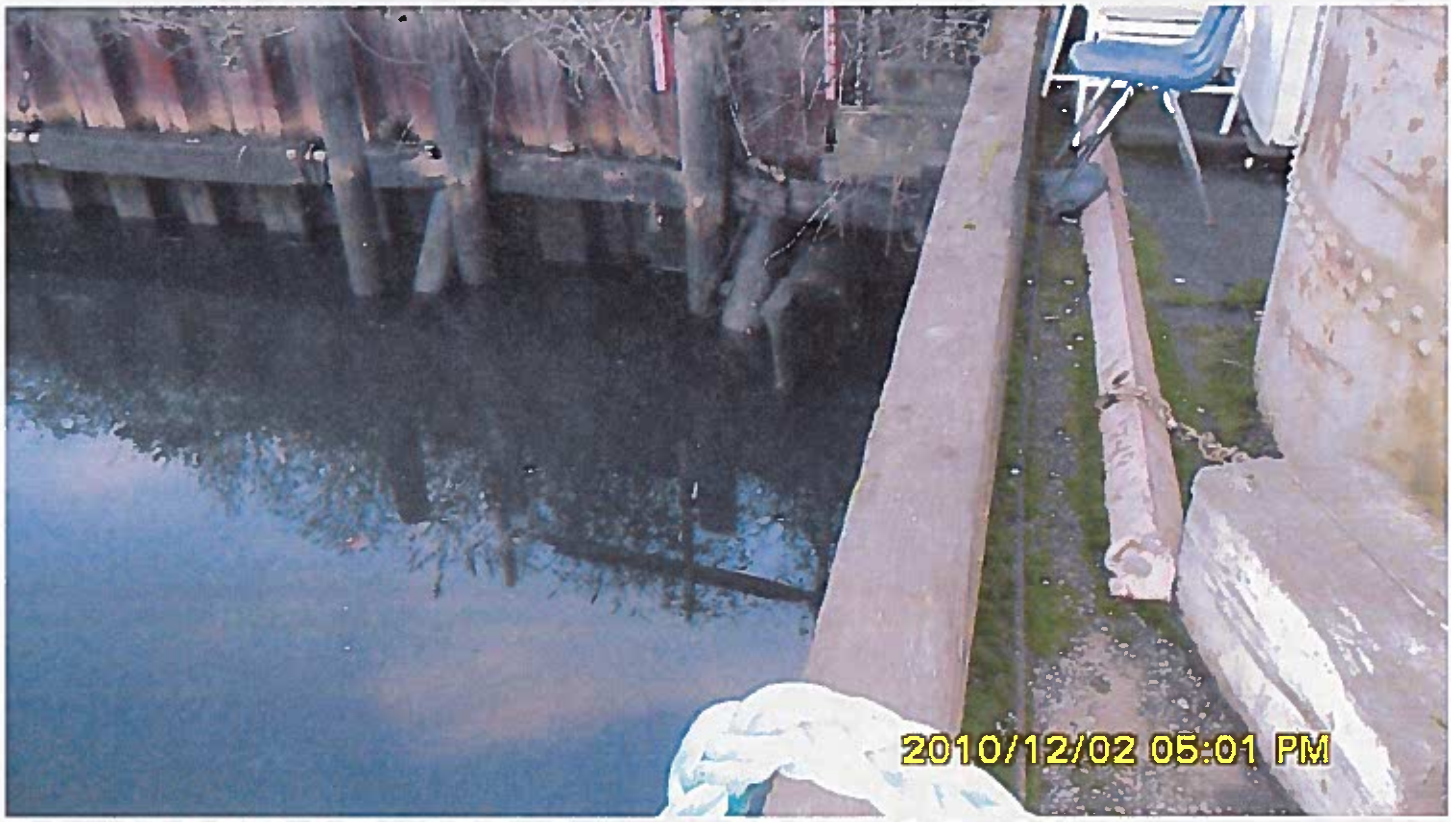
F. *Photograph Documentation*

All photographs were taken by Derek Schruhl on December 2nd, 2010 *Date is one hour fast.

Photograph 1. Facing southwest, photograph of the entrance/exit to SIM

Photograph 2. Facing SW, entrance to the facility with shredder in the background with steam rising and moving to the N.

Photograph 3. Access to stormwater treatment in the center of the facility.



Photograph 4. Outfall for facility and city line; there was a small discharge at the time of picture.

Photograph 5. Facing NNE from the south dock looking that shredder on the right, maintenance facility in the background, and north dock on the left of the photo.

Photograph 6. Facing south, view of south dock.

Photograph 7. Facing WSW, view of Duwamish waterway bank edge.

Photograph 8. Facing north, area of facility that is sloping to the west toward the north dock and Duwamish.

Photograph 9. Facing ESE, another photo of Duwamish bank edge.

Photograph 10. Facing ESE, photo of one of the pre-shred piles.

United States Environmental Protection Agency
Washington, D.C. 20460

Water Compliance Inspection Report

Section A: National Data System Coding (i.e., PCS)

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 N	WA0013198	10042 9	I	R	2

Remarks

21 66

Inspection Work Days	Facility Self-Monitoring Evaluation Rating	BI	QA	Reserved
67 10 69	70	71	72	73 74 75 80

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*

Seattle Iron & Metals Corp
601 S Myrtle St
Seattle WA 98108

Entry Time/Date: 04/29/10 9:30AM

Exit Time/Date: 04/29/10 11:30 AM

Permit Effective Date: 12/01/2007

Permit Expiration Date: 10/25/2012

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)

Eric Paul Assistant VP of Operations
ph (206) 682-6040 fax (206) 623-1231

Other Facility Data *(e.g., SIC NAICS, and other descriptive information)*

SIC 5093
Scrap Metal Recycling
RECON

Name, Address of Responsible Official/Title/Phone and Fax Number

Eric Paul Assistant VP of Operations
ph (206) 682-0406 fax (206) 623-1231

Contacted ☑ Yes ☐ No

Section C: Areas Evaluated During Inspection *(Check only those areas evaluated)*

☐ Permit	☐ Self-Monitoring Program	☐ Pretreatment	☐ MS4
☐ **Records/Reports**	☐ Compliance Schedules	☐ Pollution Prevention	
☒ Facility Site Review	☐ Laboratory	☐ Storm Water	
☐ Effluent/Receiving Waters	☐ Operations & Maintenance	☐ Combined Sewer Overflow	
☐ Flow Measurement	☐ Sludge Handling/Disposal	☐ Sanitary Sewer Overflow	

Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

SEV Codes | SEV Description

Report to follow

RECEIVED
MAY 21 2010
U.S. EPA REGION 10
OFFICE OF COMPLIANCE AND ENFORCEMENT

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers	Date
Jon Klemesrud	EPA R10 - 206 553 - 5065	05/21/10
Dave Tarpening	EPA R10 206 553 - 6905	05/21/10
Signature of Management Q A Reviewer	**Agency/Office/Phone and Fax Numbers**	**Date**
		06/17/10

EPA Form 3560-3 (Rev 1-06) Previous editions are obsolete.

IC IS/PCS
5-24-2010

INSTRUCTIONS

Section A: National Data System Coding *(i.e., PCS)*

Column 1: Transaction Code: Use N, C, or D for New, Change, or Delete. All inspections will be *new* unless there is an error in the data entered.

Columns 3-11: NPDES Permit No. Enter the facility's NPDES permit number - third character in permit number indicates permit type for U=unpermitted, G=general permit, etc.. *(Use the Remarks columns to record the State permit number, if necessary.)*

Columns 12-17: Inspection Date. Insert the date entry was made into the facility. Use the year/month/day format (e.g., 04/10/01 = October 01, 2004).

Column 18: Inspection Type*. Use one of the codes listed below to describe the type of inspection:

A Performance Audit
B Compliance Biomonitoring
C Compliance Evaluation (non-sampling)
D Diagnostic
F Pretreatment (Follow-up)
G Pretreatment (Audit)
I Industrial User (IU) Inspection
J Complaints
M Multimedia
N Spill
O Compliance Evaluation (Oversight)
P Pretreatment Compliance Inspection
R Reconnaissance
S Compliance Sampling

U IU Inspection with Pretreatment Audit
X Toxics Inspection
Z Sludge - Biosolids
Combined Sewer Overflow-Sampling
$ Combined Sewer Overflow-Non-Sampling
+ Sanitary Sewer Overflow-Sampling
& Sanitary Sewer Overflow-Non-Sampling
\ CAFO-Sampling
= CAFO-Non-Sampling
2 IU Sampling Inspection
3 IU Non-Sampling Inspection
4 IU Toxics Inspection
5 IU Sampling Inspection with Pretreatment
6 IU Non-Sampling Inspection with Pretreatment
7 IU Toxics with Pretreatment

! Pretreatment Compliance (Oversight)
@ Follow-up (enforcement)
{ Storm Water-Construction-Sampling
} Storm Water-Construction-Non-Sampling
: Storm Water-Non-Construction-Sampling
~ Storm Water-Non-Construction-Non-Sampling
< Storm Water-MS4-Sampling
- Storm Water-MS4-Non-Sampling
> Storm Water-MS4-Audit

Column 19: Inspector Code. Use one of the codes listed below to describe the *lead agency* in the Inspection.

A — State (Contractor)
B — EPA (Contractor)
E — Corps of Engineers
J — Joint EPA/State Inspectors—EPA Lead
L — Local Health Department (State)
N — NEIC Inspectors

O — Other Inspectors, Federal/EPA (Specify in Remarks columns)
P — Other Inspectors, State (Specify in Remarks columns)
R — EPA Regional Inspector
S — State Inspector
T — Joint State/EPA Inspectors—State lead

Column 20: Facility Type. Use one of the codes below to describe the facility.

1 — Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.
2 — Industrial. Other than municipal, agricultural, and Federal facilities.
3 — Agricultural. Facilities classified with 1987 SIC 0111 to 0971.
4 — Federal. Facilities identified as Federal by the EPA Regional Office.
5 — Oil & Gas. Facilities classified with 1987 SIC 1311 to 1389.

Columns 21-66: Remarks. These columns are reserved for remarks at the discretion of the Region.

Columns 67-69: Inspection Work Days. Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, and remote sensing; and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation.

Column 70: Facility Evaluation Rating. Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

Column 71: Biomonitoring Information. Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

Column 72: Quality Assurance Data Inspection. Enter Q if the inspection was conducted as followup on quality assurance sample results. Enter N otherwise.

Columns 73-80: These columns are reserved for regionally defined information.

Section B: Facility Data

This section is self-explanatory except for "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, other updates to the record, SIC/NAICS Codes, Latitude/Longitude).

Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. Use the headings given on the report form (e.g., Permit, Records/Reports) when discussing the areas evaluated during the inspection.

Section D: Summary of Findings/Comments

Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.

*Footnote: In addition to the inspection types listed above under column 18, a state may continue to use the following wet weather and CAFO inspection types until the state is brought into ICIS-NPDES: K: CAFO, V: SSO, Y: CSO, W: Storm Water 9: MS4. States may also use the new wet weather, CAFO and MS4 inspections types shown in column 18 of this form. The EPA regions are required to use the new wet weather, CAFO, and MS4 inspection types for inspections with an inspection date (DTIN) on or after July 1, 2005.

NPDES/PCB
Inspection Report

Seattle Iron & Metals Corp.
601 S. Myrtle St.
Seattle, WA 98108

Prepared by:

Jon Klemesrud
Environmental Protection Agency, Region 10
Office of Compliance and Enforcement
Inspection and Enforcement Management Unit

Table of Contents

[Unless otherwise noted, all details in this inspection report were obtained from conversations with Ed Armstrong, Eric Paul, or Raymond Perez, or from observations made during the inspection.]

I. Facility Information

Facility Name:	Seattle Iron & Metals Corp.
Facility Contact(s):	Eric Paul- Assistant Vice President Operations Phone: (206) 682-0040
	Raymond Perez- Water Treatment/Maintenance Phone: (206) 682-0040
	Ed Armstrong- Ferrous/Maintenance Manager Phone: (206) 682-0040
SIC Code Facility Type:	(5093)-Scrap Metal Yard
Facility Location:	601 S. Myrtle St. Seattle, WA 98108
GPS:	N 47.53924/W 122.32771
Mailing Address:	601 S. Myrtle St. Seattle, WA 98108

II. Inspection Information

Inspection Dates:	April 29, 2010 & May 11, 2010
Inspectors:	Jon Klemesrud, Inspector EPA Region 10, OCE / IEMU (206) 553-5068
	Dave Terpening, Inspector EPA Region 10, OCE / IEMU (206) 553-6905
	(April 29th Only) Robert Wright, Water Quality Specialist Washington Department of Ecology (206) 909-6640

Inspectors (cont):	(May 11th Only) Jed Januch, Investigator EPA Region 10, OEA (360) 871-8731	
	(May 11th Only) Beth Schmoyer, Engineer Seattle Public Utilities (206) 384-1199	
Arrival Time:	April 29, 2010: 09:30AM	May 11, 2010: 09:30AM
Departure Time:	April 29, 2010: 11:30AM	May 11, 2010: 10:30PM
Weather Condition:	Partly Cloudy	

Purpose: The inspection was conducted to document the facility's compliance with their NPDES Individual Permit No. WA0031968 as well as to determine its compliance with the PCB regulations, 40 CFR Part 761, as published in the Federal Register of May 31, 1979, and as amended.

This inspection also included sediment sampling from catch basins in and around the facility. Theses sediments samples were analyzed for metals and PCBs. This sediment sampling was requested by the Superfund Program.

III. Facility Description

Seattle Iron & Metals is a scrap metal yard facility that collects ferrous and non-ferrous metals for recycling. After collection, metals are sorted by grade and size, shredded, and sold to other companies for recycling. There is no significant processing of the metals at this facility other than size reduction.

The industrial activity at the plant is exposed to stormwater and the discharge location is the Duwamish River. (See Attachment D, Facility Map) The facility is currently operating under NPDES Individual Permit # WA0031968.

IV. Owner and Operator Information

Seattle Iron & Metals Corp. is owned by the Sidell family, and operated by Eric Paul, Assistant Vice President of Operations.

V. Compliance History

On August 13, 2008 the State of Washington Department of Ecology issued Seattle Iron & Metals Corp (SIM) a Notice of Violation for stormwater effluent violations (TPH, zinc, lead, copper and turbidity) for exceedances occurring between December 2007 and June 2008. Also included in the Notice of Violation was an unauthorized discharge of turbid wastewater of about 22,000 gallons on July 21, 2008.

On November 14, 2008 the State of Washington Department of Ecology issued SIM an Administrative Order requiring SIM to submit engineering reports, studies, and schedules to provide for compliance with the permit. The Administrative Order is attached in this document as Attachment A.

See Attachment B, Effluent Violations, for a complete list of effluent limitation exceedances from Outfall #001 while under the current permit. The attached data was gathered from SIM discharge monitoring report (DMR) submittals.

VI. Scope of Inspection

This inspection consisted of an opening conference to conduct initial introductions and to discuss the purpose and expectations of the inspection, a facility tour, file review, and a closing conference to discuss compliance related concerns. The on and off-site sampling effort to support the Superfund program took place following the closing conference.

VII. Inspection Entry

Dave Terpening and I first arrived at the site on April 29th, 2010 and met with Bob Wright of Washington State Department of Ecology outside of the SIM facility. The purpose of this visit was to conduct a reconnaissance inspection outside the facility to identify nearby storm drains where we could collect the samples requested by the EPA Superfund Program.

Shortly after arriving outside the facility we were greeted by Eric Paul, Assistant Vice President of Operations. Upon meeting Mr. Paul, we explained the purpose of our visit. Dave and I presented our credentials to Mr. Paul and then continued with our reconnaissance inspection of the storm drains outside the facility.

On May 11, 2010, Dave Terpening and I returned to the SIM facility at 9:30am to conduct a routine compliance inspection of the facility. This was an unannounced inspection. We were joined on this inspection by Jed Januch (EPA) and by Beth Schmoyer of Seattle Public Utilities.

Upon arriving at the facility we met with Raymond Perez, Water Treatment/Maintenance Operator and Ed Armstrong, Ferrous/Maintenance Manager. Eric Paul who would usually deal with the compliance related activities was on vacation at the time of inspection.

Upon arriving at the facility, Dave, Jed, and I identified ourselves as EPA inspectors, presented our credentials and provided business cards to Mr. Perez and Mr. Armstrong. I informed them that the purpose of this visit was to conduct an inspection to determine compliance with the facility's NPDES Industrial Stormwater Permit, and to determine compliance with the Federal PCB regulations. We then presented Mr. Perez with a TSCA Notice of Inspection form and asked Mr. Perez to read and sign it before we start the inspection. The signed form is attached to this inspection report as Attachment C.

VIII. Inspection Findings

After the opening conference we proceeded to conduct a facility tour. Mr. Perez and Mr. Armstrong walked us through the metal yard identifying the drains on the facility and the stormwater treatment system.

A. Description of Stormwater Treatment Process

The design of the stormwater system at the facility is such that stormwater runoff is routed into multiple catch basins on site, all lined with filter socks and a metal catch basket. All stormwater catch basins except the administrative parking lot catch basin are are routed to a 48,000 gallon underground detention pipe prior to treatment.

The stormwater treatment system includes 3 chemical reaction tanks, a dissolved air flotation (DAF) unit, and four multi-media pressure filtration units (tertiary polishing filters or TPF's).

Collected stormwater first passes through the chemical reaction tanks (See Attachment G, Photo #4) in which chemicals are added to facilitate metal precipitation, coagulation and flocculation.

Water from the chemical reaction tanks pass through to the DAF unit, designed to remove suspended solids, oils and grease by air flocculation.

Sludge from the DAF unit is pumped to a 5,000gal conical bottom settling tank. This sludge is hauled away and disposed as needed by PRS Group, Inc. out of Tacoma, WA. According to Mr. Perez sludge was last hauled away about a year ago.

The treated water from the DAF unit enters the multi-media filters (TPF's). The filters are designed to remove filterable suspended solids.

At the end of the stormwater treatment system is a sampling port used by SIM staff to collect effluent samples before being discharged through Outfall #001 to the Duwamish River.

B. Non-Treated Stormwater Discharges

SIM has two sources of stormwater that are not captured and treated in their treatment system. One source is an administrative parking lot located at the east end of the property. There is no industrial activity performed in this parking lot.

Stormwater from this parking lot is routed through a catch basin and goes through an oil/water separator before being discharged to the city's stormwater line on S Myrtle St.

The second source of stormwater not captured and treated is the roof runoff from each of the buildings. The runoff from theses roofs are routed directly to the city's stormwater line on S Myrtle St.

C. Planned Expansion/Construction

Mr. Perez stated that the facility is in the design stages of an expansion project that would include expanding their operations on the east side of the facility to the property at 701 S Orchard St. This would allow SIM to haul auto fluff material from the main yard area to the existing building at 701 S Orchard St for further processing. According to Beth Schmoyer the City of Seattle is currently reviewing the permit applications for modifications to the existing building and drainage system.

SIM also has plans to install a pretreatment system during the last week of June 2010. This pretreatment system will be incorporated with the existing treatment system to treat all stormwater from the facility. The pretreatment system would consist of a vortex grit separator and an oil and water separator. The system would connect to the underground detention pipe where all stormwater is first routed. Ideally the addition of the pretreatment would allow for the current DAF treatment system to be more effective by having the stormwater treated before entering the DAF system.

D. Sediment and Track-Out Handling

Track-out issues at SIM are addressed by sweeping the exit/entrance each morning using a street sweeping vehicle. Mr. Perez stated an employee sweeps each morning instead of at the end of the day because the employee has an earlier shift and leaves a few hours before processes stop at the facility.

The facility has looked into the construction of a vehicle wheel wash at the entrance of the facility on S Myrtle St. to minimize track out. However, according to Eric Paul the entrance is too small to construct a wheel wash area. SIM is now looking into other BMPs to minimize track out. See Attachment G, Photo #1, to see the condition of the entrance/exit at the time of inspection.

To minimize sediment and other particulate matter from entering the treatment system SIM utilizes a Bobcat vehicle with a sweeping attachment to sweep inside the facility, employees also manually sweep with brooms as needed.

Sediment socks from each catch basin are replaced quarterly if not more frequently. Mr. Perez keeps a log of every catch basin on site and notes when each filter sock is replaced or is scheduled to be replaced. This log also includes records of when each catch basin is pumped and cleaned. Sediments from the filter fabric are sent for disposal to PRS Group, Inc. out of Tacoma, WA as needed.

E. Sampling and Analysis

Sampling is conducted by Mr. Perez and samples are taken to Freemont Analytical for the monthly analysis as required in the permit.

F. PCB Activity

Mr. Perez stated that the facility does not accept PCB equipment; all items unloaded at the facility are supervised when sorted. SIM has never had a stormwater discharge that exceeded the maximum daily PCB effluent limitation of 10ug/l as defined in their permit.

IX. Superfund Sampling Request

Metals and PCB sampling was requested by the EPA Region 10 Superfund Program to gather sediment data for on and off-site catch basins at the facility for source tracing in order to develop a strategy to protect the sediments and outfalls in the vicinity of SIM

Four sediment samples were collected for this project. Sample 10194000 was collected from a roof drain on the main office building; sample 10194001 was collected from a rain gutter on the north facing side of the maintenance building, sample 10194002 was collected from a catch basin in the employee parking lot, and sample 10194003 was collected from a catch basin on the south side S Myrtle St. Split samples were given to Beth Schmoyer for Seattle Public Utilities own analysis.

Screening level analysis for metals by x-ray fluorescence (XRF) spectroscopy was performed on the samples on May 11th, 2010. Results of this screening analysis can be found in Attachment F, XRF screening level analysis.

As of the completion date of this report, additional sample analysis for metals and analysis for PCBs were not yet completed by U.S. EPA Manchester Environmental Laboratory. Once these results become available they will be appended in the report.

X. NPDES Areas of Concern

We inspected the facility including the storm drains, metal yard, sorting line, the facility's SWPPP and monitoring records. Observations during the inspection included the identification of two areas of concern. These areas of concern are described as follows.

Sampling and Analytical Procedures

A. Section S2.B of the permit states that samples and measurements taken to meet the requirements of this permit must be representative of the volume and nature of the monitored parameters.

According to Mr. Paul pH is routinely analyzed at Freemont Analytical without taking into consideration the 15min holding time as defined in 40 CFR Part 136.3 *Table II-Required containers, preservation techniques, and holding times.* Mr. Paul stated that he was not aware of the holding time and that the lab had not mentioned it.

Stormwater Effluent Limits Exceedances

B. Section S1.B of the permit states that beginning on the effective date of this permit and lasting through the expiration date, the Permittee is authorized to discharge stormwater discharges at the permitted location subject to complying with the following limitations:

EFFLUENT LIMITATIONS: OUTFALL # 001	
Parameter	**Maximum Daily** [a]
Total Recoverable Copper	5.8 µg/L
Total Recoverable Lead	220.8 µg/L
Total Recoverable Zinc	95.1 µg/L
Total PCBs	10 µg/L
Total Petroleum Hydrocarbons (TPH)	5 mg/L
Turbidity	5 NTU [b]
pH	Within the range of 6.5 to 8.5 s.u.
[a] The Maximum Daily effluent limitation is defined as the highest allowable concentration of permitted parameters in the discharge per monitoring requirements.	
[b] The maximum daily is the maximum of daily averages.	

See Attachment B, Effluent Violations, for a complete list of effluent limitation exceedances from Outfall #001 while under the current permit. The attached data was gathered from SIM discharge monitoring report (DMR) submittals.

According to Mr. Perez the addition of the pretreatment system this summer will allow the current treatment system to operate more efficiently and get SIM back into compliance.

XII. PCB Areas of Concern

I did not see any PCB areas of concern at the time of inspection.

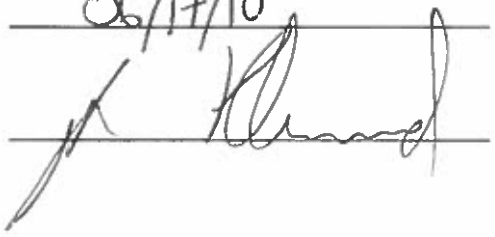
XII. Closing Conference

A closing conference was held with Mr. Perez at the time of inspection and over the phone with Mr. Paul to discuss our inspection observations.

I addressed the pH holding time concern with Mr. Paul and suggested he check with Freemont Analytical regarding this issue and review the approved EPA Methods defined in the facility's NPDES permit (page 7 of 31) for sampling events.

Report Completion Date: 06/17/10

Lead Inspector Signature:



ATTACHMENT A

Administrative Order

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
Northwest Regional Office • 3190 160th Avenue SE • Bellevue, Washington 98008-5452 • (425) 649-7000

November 14, 2008

REGISTERED MAIL
RB 336 145 623 US

Mr. Eric Paul
Seattle Iron and Metals Corporation
601 S. Myrtle Street
Seattle, WA 98108

Dear Mr. Paul:

Enclosed is Follow-up Order No. 6185 requiring Seattle Iron and Metals Corporation (SIM) to take corrective actions to prevent further violations of the State Waste Discharge Permit No. WA-003196-8 from occurring. The details of these actions are listed in the Order. The Order requires an engineering report and compliance schedule to ensure compliance with the permit. All correspondence relating to this document should be directed to Enforcement Coordinator at Department of Ecology, Northwest Regional Office, 3190 – 160th Avenue SE, Bellevue, WA 98008-5452. If you have any questions concerning the content of the document, please call Ed Abbasi at (425) 649-7227.

Sincerely,

Kevin C. Fitzpatrick
Water Quality Section Manager

KCF:EA:ct
Enclosure
cc: Larry Altose, Ecology PIO
Raman Iyer, Ecology
Jerry Shervey, Ecology
Ed Abbasi, Ecology
Cyma Tupas, Ecology
Central Files: Seattle Iron and Metals Corporation; Permit No. WA-003196-8; WQ 6.4

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

IN THE MATTER OF AN ADMINISTRATIVE ORDER AGAINST: Seattle Iron and Metals Corporation	))))	FOLLOW-UP ORDER No. 6185

To: Mr. Eric Paul
Seattle Iron and Metals Corporation
601 S. Myrtle Street
Seattle, WA 98108

This is an Administrative Order requiring Seattle Iron and Metals Corporation (SIM) to comply with Chapter 90.48 of Revised Code of Washington and the rules and regulations of the Department of Ecology as set forth in the State Waste Discharge Permit No. WA-003196-8, by taking certain actions which are described herein. The Order requires SIM to submit engineering reports, studies, and schedules to provide for compliance with the permit. RCW 90.48.120 (2) authorizes the Department of Ecology (Department) to issue Administrative Orders to accomplish the purposes of this Chapter RCW 90.48.

The Department's determination that a violation has occurred is based on the following facts:

On August 13, 2008, the Department issued a Notice of Violation (NOV) No: 5858 to Seattle Iron and Metals Corporation for:

Violations:

A. Stormwater Effluent Violations (TPH, zinc, lead, copper, and turbidity). December 2007 through June 2008.

According to the submitted Discharge Monitoring Reports (DMRs) covering a period between December 1, 2007, and June 30, 2008, SIM violated TPH, zinc, lead, copper, and turbidity discharge limitations for Outfall 001 of NPDES Waste Discharge Permit No. WA-003196-8. *These exceedances are violations of Condition S1.B of the permit as covered under RCW 90.48.* The specific violations for Outfall 001 were as follows:

Date	Parameter	Qualifier	DMR Value	Unit	Type	Min. Value	Max. Value
1-Dec-07	PETROLEUM HYDROCARBONS, TOTAL RECOVERABLE		17.1	MG/L	MAX		5
1-Jan-08	PETROLEUM HYDROCARBONS, TOTAL RECOVERABLE		33	MG/L	MAX		5
1-Feb-08	PETROLEUM HYDROCARBONS, TOTAL RECOVERABLE		33	MG/L	MAX		5
1-Mar-08	PETROLEUM HYDROCARBONS, TOTAL RECOVERABLE		45	MG/L	MAX		5
1-Apr-08	PETROLEUM HYDROCARBONS, TOTAL RECOVERABLE		13.2	MG/L	MAX		5
1-Jun-08	PETROLEUM HYDROCARBONS, TOTAL RECOVERABLE		11.1	MG/L	MAX		5
1-Dec-07	ZINC, TOTAL RECOVERABLE		1440	UG/L	MAX		95.1
1-Jan-08	ZINC, TOTAL RECOVERABLE		967	UG/L	MAX		95.1
1-Feb-08	ZINC, TOTAL RECOVERABLE		725	UG/L	MAX		95.1
1-Mar-08	ZINC, TOTAL RECOVERABLE		544	UG/L	MAX		95.1
1-Jun-08	ZINC, TOTAL RECOVERABLE		225	UG/L	MAX		95.1
1-Dec-07	LEAD, TOTAL RECOVERABLE		260	UG/L	MAX		220.8
1-Dec-07	COPPER, TOTAL RECOVERABLE		102	UG/L	MAX		5.8
1-Jan-08	COPPER, TOTAL RECOVERABLE		55	UG/L	MAX		5.8
1-Feb-08	COPPER, TOTAL RECOVERABLE		25	UG/L	MAX		5.8
1-Mar-08	COPPER, TOTAL RECOVERABLE		34	UG/L	MAX		5.8
1-Jun-08	COPPER, TOTAL RECOVERABLE		15	UG/L	MAX		5.8
1-Dec-07	TURBIDITY		48	NTU	AVG		5
1-Jan-08	TURBIDITY		72	NTU	AVG		5
1-Feb-08	TURBIDITY		54	NTU	AVG		5
1-Mar-08	TURBIDITY		63	NTU	AVG		5
1-Apr-08	TURBIDITY		6.9	NTU	AVG		5
1-Jun-08	TURBIDITY		18	NTU	AVG		5

Note: May 2008 for Outfall 001 – No qualifying storm event – No Discharge

B. Unauthorized discharge of turbid wastewater to the Duwamish River on July 21, 2008.

In addition, this facility processed and discharged about 22,000 gallons of wastewater to the Duwamish River on July 21, 2008. The discharge caused white plume in the Duwamish River. The nature of discharge is unknown since the event was not sampled, and it was not reported to the Department by the Permittee. A citizen photographed the event and notified the Department. Although the outfall is shared with the City of Seattle, the weather was clear and no rain was recorded and the facility has admitted to having discharge on that day. According to the facility, the discharge appeared clear at their treatment plant contrary to the photographs of the receiving water taken by the citizen group and submitted to the Department on July 21, 2008. Ecology's inspector visited the facility on August 13, 2008, to observe the treatment and the discharge. Apparently the discharge from the treatment system did appear clear on this day, but it became whitish foam at the time of contact with the receiving water during low tide, as observed and photographed by the citizen.

This incident is a violation of Condition S3.E.1.a, which states that.... *"Any noncompliance that may endanger health or the environment must be reported to the Department immediately within 24 hours from the time the Permittee becomes aware of this circumstance."*

Turbid wastewater was discharged to state waters on July 21, 2008, in violation of RCW 90.48.080. RCW 90.48.080 states that.....*it shall be unlawful for any person to throw, drain, run, or otherwise discharge into any of the waters of this state, or to cause, permit or suffer to be thrown, run, drained, allowed to seep or otherwise discharged into such waters any organic or inorganic matter that shall cause or tend to cause pollution of such waters according to the determination of the department.*

On August 19, 2008, SIM submitted a response letter for the above-referenced NOV. The response letter addressed the company's acknowledgement of the effluent violations and unauthorized discharge cited in the NOV, and the steps that have been taken and which are proposed to be taken by the company, to correct the violations. However, the response letter failed to provide a specific time-line for each proposed action to be taken by the company.

Corrective Actions: For these reasons, and in accordance with RCW 90.48, it is ordered that Seattle Iron and Metals Corporation prepare and submit engineering and construction documentation schedules to ensure compliance with the permit for the facility located at 601 S. Myrtle Street, Seattle, WA 98108. All engineering reports and plans submitted to the Department must comply with Chapter 173-240 WAC.

A. SIM must evaluate the adequacy and appropriateness of the existing Dissolved Air Floatation (DAF) and Filtration treatment unit and submit an engineering report to the Department for review and approval according to the compliance schedule shown below.

   The report shall identify shortcomings of the DAF for an appropriate design storm and must recommend remedies to eradicate the identified shortcoming. The possible remedies are, but not limited to, introduction and addition of new treatment units, expansion of the existing treatment unit and the existing detention vault, addition of pretreatment units, and extensive source control and pollution prevention at the site. Due to the nature of the runoff on this site and potential for creation of anaerobic condition inside the vault and rise in toxicity, the engineering report shall identify ways and means that would enable SIM to maximize treatment and collection of stormwater after each storm.

B. SIM must evaluate through a comprehensive engineering study, the drainage, topology, and hydrology of their existing site to identify quantity of potential contaminated stormwater runoffs and their potential entrance to the receiving water and submit an engineering report to the Department for review and approval according to the compliance schedule shown below.

   The evaluation shall examine the entire site, including shipping dock for cracks and leaks. It must also evaluate roads adjacent to SIM immediately leaving the SIM facility for pollutants that are tracked out by vehicles, and for pollution and contamination caused by SIM operations. The hydrologic study must be conducted using continuous hydrologic model, such as Western Washington Hydrologic Model, or a similar model approved by the Department.

C. Compliance Schedule

• **Pretreatment Engineering Report** The report shall identify pretreatment unit for the SIM facility with respect to 10-year, 24-hour storm design and use of Western Washington Hydrologic Model, or similar model approved by the Department of Ecology.	December 30, 2008
• **Stormwater Treatment Engineering Report** The report shall evaluate adequacy and appropriateness of existing DAF treatment system and its hydrologic capabilities. The report must identify an optimum design storm that maximizes the treatment system capability using Western Washington Hydrologic Model, or similar model approved by the Department of Ecology.	May 30, 2009
• **Stormwater Quality Improvement Report** The report shall evaluate other stormwater issues related to SIM operation and infrastructure. The report shall include an evaluation of shipping dock for cracks and leaks, and roads adjacent to SIM immediately leaving the SIM facility for pollutants that are tracked out by vehicles, and for pollution and contamination caused by SIM operations.	May 30, 2009
• **Mixing Zone Work Plan** The report would propose modeling methodology, sampling and analyses, and associated quality assurance plan.	January 30, 2009
• **Mixing Zone Study** The report shall contain results of mixing zone modeling efforts and any site-specific sampling and analysis required to determine minimum mixing zone and associated dilution factor for this site.	July 30, 2009

D. An Operation and Maintenance Manual (OMM) for the approved treatment unit shall be submitted one (1) month prior to completion of construction and installation, in compliance with WAC 173-240-150.

E. This Order shall not be construed as satisfying other conditions in the existing permit, or other applicable federal, state, or local statutes, ordinances or regulations.

Failure to comply with this Order may result in the issuance of civil penalties or other actions, whether administrative or judicial, to enforce the terms of this Order.

You have a right to appeal this Order. To appeal this you must:

- File your appeal with the Pollution Control Hearings Board within thirty (30) days of the "date of receipt" of this document. Filing means actual receipt by the Board during regular office hours.
- Serve your appeal on the Department of Ecology within thirty (30) days of the "date of receipt" of this document. Service may be accomplished by any of the procedures identified in WAC 371-08-305(10). "Date of receipt" is defined at RCW 43.21B.001(2).

Be sure to do the following:

- Include a copy of this document that you are appealing with your Notice of Appeal.
- Serve and file your appeal in paper form; electronic copies are not accepted.

1. **To file your appeal with the Pollution Control Hearings Board:**

Mail appeal to:		Deliver your appeal in person to:
The Pollution Control Hearings Board PO Box 40903 Olympia WA 98504-0903	OR	The Pollution Control Hearings Board 4224 – 6th Ave SE Rowe Six, Bldg 2 Lacey WA 98503

2. **To serve your appeal on the Department of Ecology:**

Mail appeal to:		Deliver your appeal in person to:
The Department of Ecology Appeals & Application for Relief Coordinator PO Box 47608 Olympia WA 98504-7608	OR	The Department of Ecology Appeals & Application for Relief Coordinator 300 Desmond Dr SE Lacey WA 98503

3. **And send a copy of your appeal to:**

Enforcement Coordinator
Department of Ecology
Northwest Regional Office
3190 160th Ave SE
Bellevue WA 98008-5452

For additional information, visit the Environmental Hearings Office Website: http://www.eho.wa.gov
To find laws and agency rules, visit the Washington State Legislature Website:
http://www1.leg.wa.gov/CodeReviser

Your appeal alone will not stay the effectiveness of this Order. Stay requests must be submitted in accordance with RCW 43.21B.320. These procedures are consistent with Ch. 43.21B RCW.

DATED November 14, 2008 at Bellevue, Washington.

Kevin C. Fitzpatrick
Water Quality Section Manager

ATTACHMENT B

Past Effluent Violations

Seattle Iron & Metals
Effluent Violations

	Date	Parameter	Value	Max	Unit
2007					
	12/1/2007	Copper	102	5.8	UG/L
	12/1/2007	Zinc	1440	95.1	UG/L
	12/1/2007	TPH	17.1	5	Mg/L
	12/1/2007	Turbidity	48	5	NTU
2008					
	1/1/2008	Copper	55	5.8	UG/L
	1/1/2008	Zinc	967	95.1	UG/L
	1/1/2008	TPH	33	5	Mg/L
	1/1/2008	Turbidity	72	5	NTU
	2/1/2008	Copper	25	5.8	UG/L
	2/1/2008	Zinc	725	95.1	UG/L
	2/1/2008	TPH	33	5	UG/L
	2/1/2008	Turbidity	54	5	NTU
	3/1/2008	Copper	34	5.8	UG/L
	3/1/2008	Zinc	544	95.1	UG/L
	3/1/2008	TPH	45	5	Mg/L
	3/1/2008	Turbidity	63	5	NTU
	4/1/2008	TPH	13.2	5	Mg/L
	4/1/2008	Turbidity	6.9	5	NTU
	6/1/2008	Copper	15	5.8	UG/L
	6/1/2008	Zinc	225	95.1	UG/L
	6/1/2008	TPH	11.5	5	MG/L
	6/1/2008	Turbidity	18	5	NTU
	8/1/2008	Copper	10	5.8	UG/L
	8/1/2008	Zinc	123	95.1	UG/L
	8/1/2008	TPH	12.4	5	Mg/L
	8/1/2008	Turbidity	44	5	NTU
	10/1/2008	Copper	23	5.8	UG/L
	10/1/2008	Zinc	510	95.1	UG/L
	10/1/2008	Turbidity	140	5	NTU
	12/1/2008	Copper	13	5.8	UG/L
	12/1/2008	Zinc	210	95.1	UG/L
	12/1/2008	Turbidity	94	5	NTU
2009					
	2/1/2009	Copper	7.7	5.8	UG/L
	2/1/2009	Turbidity	27	5	NTU
	3/1/2009	Zinc	136	95	UG/L
	3/1/2009	PCB	did not test	5	UG/L

	3/1/2009	Turbidity	66	5	NTU
	5/1/2009	Copper	32	5.8	UG/L
	5/1/2009	Zinc	400	95.1	UG/L
	5/1/2009	Turbidity	15	5	NTU
	8/1/2009	Copper	19	5.8	UG/L
	8/1/2009	Zinc	180	95.1	UG/L
	8/1/2009	Turbidity	27	5	Mg/L
	9/1/2009	Copper	12	5,8	UG/L
	9/1/2009	Zinc	140	95.1	UG/L
	9/1/2009	Turbidity	32	5	NTU
	10/1/2009	Copper	67	5.8	UG/L
	10/1/2009	Zinc	1100	95.1	UG/L
	10/1/2009	Turbidity	52	5	NTU
	11/1/2009	Copper	35	5.8	UG/L
	11/1/2009	Zinc	370	95.1	UG/L
	11/1/2009	TPH	28	5	Mg/L
	11/1/2009	Turbidity	13	5	NTU
	12/1/2009	Copper	28	5.8	UG/L
	12/1/2009	Zinc	160	95.1	UG/L
	12/1/2009	TPH	13	5	Mg/L
	12/1/2009	Turbidity	10.7	5	NTU
	12/1/2009	pH	12	9	S.U.
2010					
	1/1/2010	Copper	20	5.8	UG/L
	1/1/2010	Zinc	330	95.1	UG/L
	1/1/2010	TPH	6.2	5	Mg/L
	1/1/2010	Turbidity	19.2	5	Mg/L
	2/1/2010	Copper	21	5.8	UG/L
	2/1/2010	Zinc	190	95.1	UG/L
	2/1/2010	TPH	5.2	5	Mg/L
	2/1/2010	Turbidity	34	5	NTU

Total Effluent Violations Since Effective Date of the Permit (12/01/2007)= **66**

ATTACHMENT C

TSCA Notice of Inspection

EPA

US ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

TOXIC SUBSTANCES CONTROL ACT

NOTICE OF INSPECTION

1. INVESTIGATION IDENTIFICATION			3. FACILITY NAME
DATE: 05/11/2010	INSPECTION NO.	DAILY SEQ. NO.	Seattle Iron & Metals Corp.
2. INSPECTOR'S ADDRESS: 1200 6th Ave Suite 900 M/S OCE 104 Seattle WA 98101			4. FACILITY ADDRESS: 601 S Myrtle St Seattle, WA 98108

For Internal EPA Use. Copies may be provided to recipient as acknowledgment of this notice.

REASON FOR INSPECTION

Under the authority of Section 11 of the Toxic Substances Control Act:

☒ For the purpose of inspecting (including taking samples, photographs, statements, and other inspection activities) an establishment, facility, or other premises in which chemical substances or mixtures, articles containing same are manufactured, processed, stored or held before or after their distribution in commerce (including records, files, papers, processes, controls, and facilities) and any conveyances being used to transport chemical substances, mixtures, or articles containing same in connection with their distribution in commerce (including records, files, papers, processes, controls, and facilities) bearing on whether the requirements of the Act are applicable to the chemical substances, mixtures, or articles within, or associated with, such premise or conveyance have been complied with.

☐ In addition, this inspection extends to (check appropriate blocks):

- ☐ A. Financial data
- ☐ B. Sales data
- ☐ C. Pricing data
- ☐ D. Personnel data
- ☐ E. Research data

The nature and extent of inspection of such data specified in A through E above is as follows:

INSPECTOR'S SIGNATURE		RECIPIENT'S SIGNATURE	
NAME: Jon Klemesrud		NAME: Raymond Perez	
TITLE: Environmental Scientist	DATE SIGNED: 05/11/2010	TITLE	DATE SIGNED

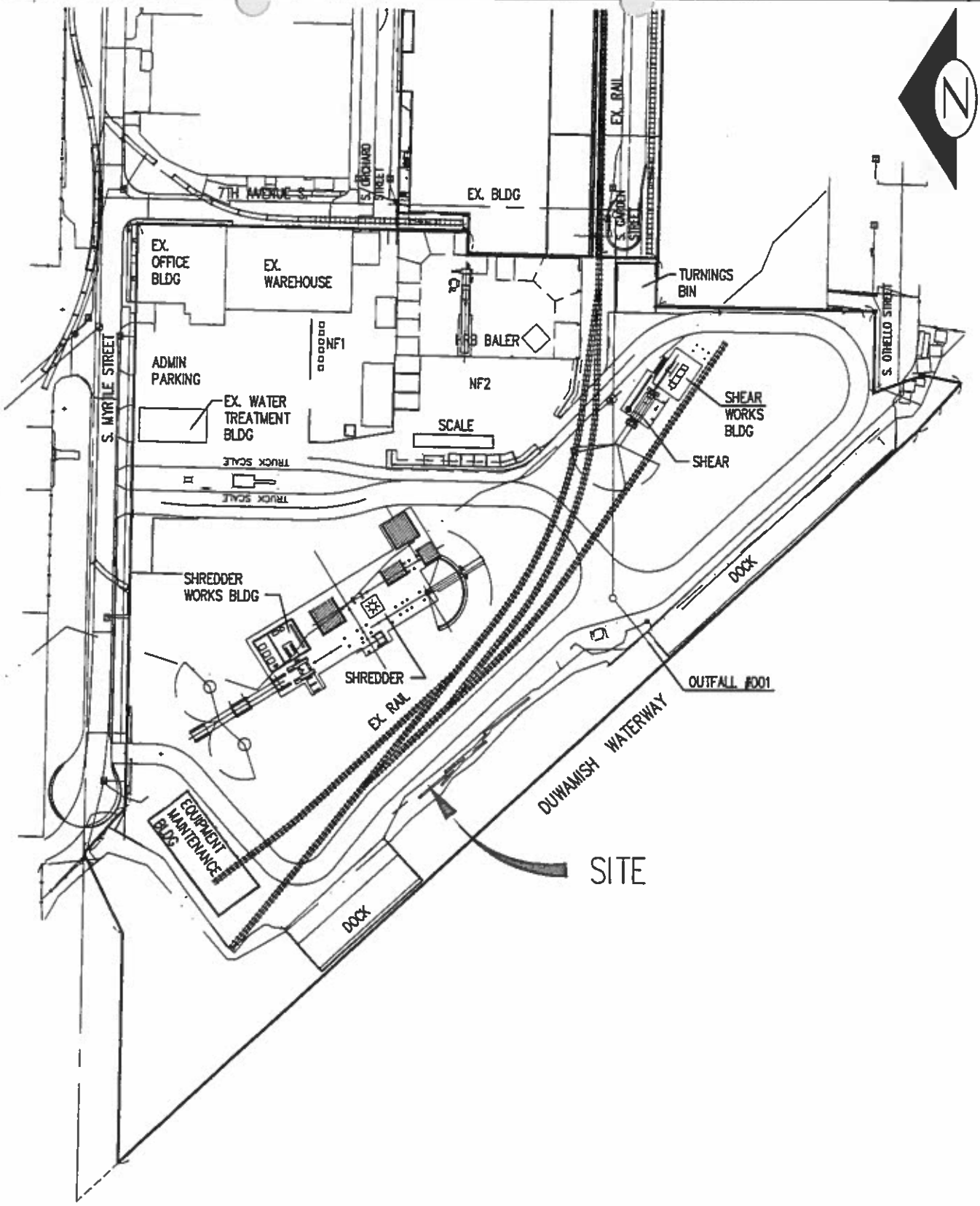
EPA FORM 7740-3 (REVISED JULY 1997) CORE TSCA --- PREVIOUS VERSIONS ARE OBSOLETE

FILE COPY

GPO:2003-520-530

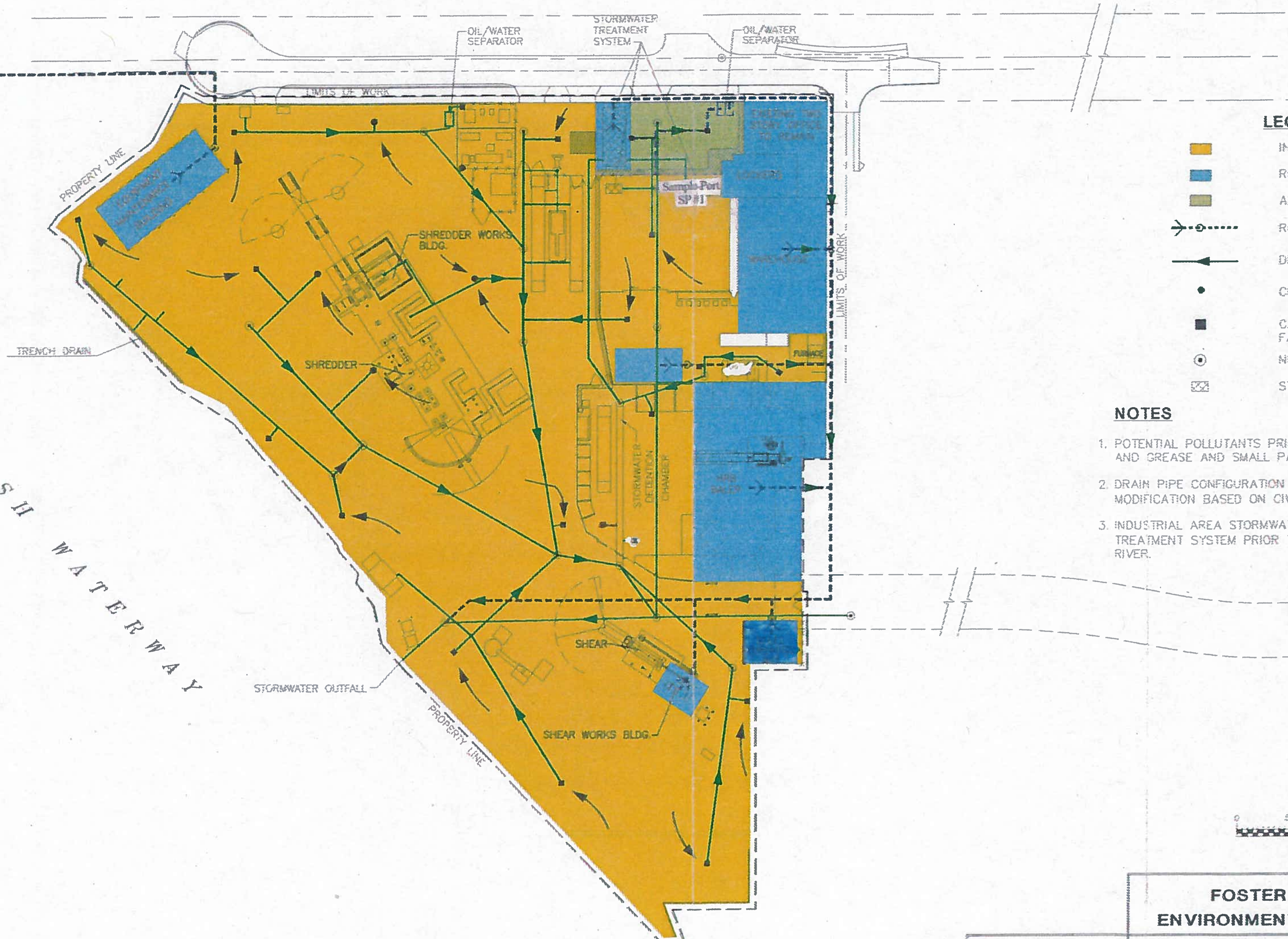
ATTACHMENT D

Facility Map/Stormwater Discharge Plan



kpff Consulting Engineers
1201 Pacific Avenue, Suite 800
Tacoma, Washington 98402
(253) 396-0150 Fax (253) 396-0162

FIGURE 2.2
601 S. MYRTLE STREET
MAP OF FACILITY



LEGEND

- INDUSTRIAL AREA
- ROOF
- ADMINISTRATIVE PARKING LOT
- ROOF AND PARKING LOT DRAINS
- DRAIN PIPES AND FLOW DIRECTION
- CLEANOUT
- CATCH BASINS EQUIPPED WITH FABRIC FILTER INSERTS
- NEW STORM DRAIN MANHOLE
- STORMWATER TREATMENT SYSTEM

NOTES

1. POTENTIAL POLLUTANTS PRIOR TO TREATMENT INCLUDE OIL AND GREASE AND SMALL PARTICULATE.
2. DRAIN PIPE CONFIGURATION IS SUBJECT TO MINOR MODIFICATION BASED ON CIVIL ENGINEER'S DISCRETION.
3. INDUSTRIAL AREA STORMWATER ROUTES TO STORMWATER TREATMENT SYSTEM PRIOR TO DISCHARGE TO THE DUWAMISH RIVER.

FOSTER WHEELER ENVIRONMENTAL CORPORATION

SEATTLE IRON & METALS CORP.

EXHIBIT B – SITE LAYOUT
STORMWATER DISCHARGE PLAN
SEATTLE IRON AND METALS CORP.

F:\PROJECTS\1800003\DWG\[illegible].DWG
PLOT/UPDATE: OCT 13 1999 15:45:40

ATTACHMENT E

Flow Diagram of Stormwater Treatment

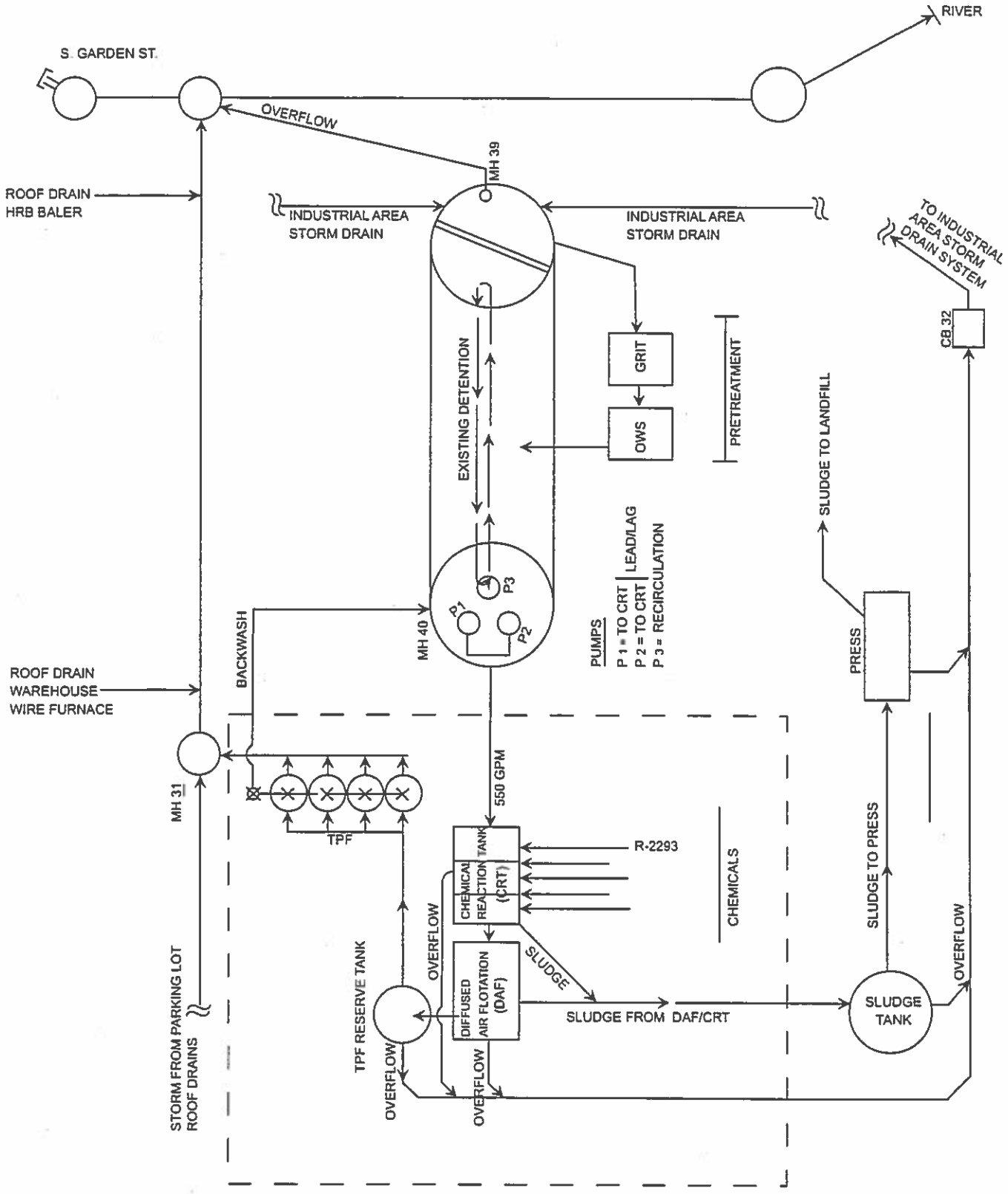


FIG. 3.2 EXISTING FLOW DIAGRAM OF STORMWATER TREATMENT SYSTEM

ATTACHMENT F

XRF Screening Level Analysis

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10 LABORATORY
7411 Beach Dr. East
PortOrchard, Washington 98366

May 28, 2010

MEMORANDUM

TO: Jon Klemesrud, Inspector
Office of Enforcement and Compliance
Inspection and Enforcement Management Unit

FROM: Jed Januch, Senior Investigator
Office of Environmental Assessment
Environmental Services Unit

SUBJECT: Case Narrative for Technical Support – Seattle Iron & Metals Corp.

Project Code: ESD-202A
Account Code: 20102011B10P501E506

Introduction

This memorandum documents screening level analysis by x-ray fluorescence (XRF) spectroscopy performed on samples collected at Seattle Iron & Metals Corporation in Seattle, Washington, on May 11, 2010. The objective of the analysis was to identify the amount of metals, specifically chromium (Cr), copper (Cu), lead (Pb), and zinc (Zn) in the samples. The sampling was conducted by EPA Region 10 field personnel and carried out in accordance with the EPA Region 10 Generic RCRA quality assurance project plan (QAPP) with a RCRA Site-Specific Inspection Plan approved by Donald Matheny, QA Chemist, on May, 2010. The XRF analysis was performed by field personnel at the EPA Region 10 Laboratory using an Innov-X portable XRF spectrometer. It was operated according to the EPA Region 10 standard operating procedure for XRF (soil and sediment) Revision 1, May 18, 2009, and following EPA SW 846, Method 6200 (USEPA, 1998).

Sampling Procedure

A total of four sediment samples were collected for this project. Sample 10194000 was collected from a roof drain on the main office building, sample 10194001 was collected from a rain gutter on the north facing side of the maintenance building, sample 10194002 was collected from a catch basin in the employee parking lot, and sample 10194003 was from a catch basin on the south side of Myrtle Street. The samples were collected with clean stainless steel spoons and composited in clean stainless steel mixing bowls. The samples were placed inside new/clean quality control (QC) class 500 milliliter (ml) glass containers with Teflon®-lined plastic lids. A copy of the quality certification from the manufacturer of the sample containers is included in Attachment 1. The sample containers were labeled, enclosed in zip lock bags, and placed in a clean cooler containing wet ice for transportation under chain of custody to the EPA Region 10 Laboratory in Port Orchard, Washington. The samples were submitted to Karen Norton, EPA Region 10 Laboratory sample custodian, on May 12, 2010. A copy of the chain of custody form is included in Attachment 2.

Microscopic Examination

The samples were examined with a Wild M-5A stereomicroscope to provide a basic physical description of the sample material. In addition to soil and organic matter, I observed various paint fragments and fibrous material, both synthetic and glass. A digital image of material observed in sample 10194002 is included in Figure 1.

Figure 1 – Paint fragments in sample 10194002.

XRF Analysis

Screening-level analysis for certain metals was conducted at the laboratory on May 14 and May 25, 2010, using an Innov-X portable XRF spectrometer, Model α-4000 SL (serial number 5514). The XRF was calibrated by the manufacturer (calibration certificate number 0111621-1) on March 31, 2010. A copy of the calibration certificate is included in Attachment 3.

The XRF was operated in the soil analysis mode and set for the standard analysis program. The XRF screening was performed on a subsample of the samples submitted to the laboratory. The following QC measurements were performed during this project:

- Instrument resolution check using an Alloy 316 standard.
- Instrument blank sample consisting of quartz (SiO_2).
- Calibration verification was conducted by analyzing two standard reference materials (SRM) 2702 and 2781 issued by the National Institute of Standards and Technology (NIST).
- Precision measurement (seven repeat analyses) was performed on sample 10194002.

Results of Screening-Level Analysis

When interpreting results of screening-level analysis by portable XRF, the end user of the data must consider the limitations of this instrument. The portable XRF generates a great deal of

data relatively quickly; however data may be impacted by the degree of homogeneity of the sample, spectral interference, chemical interference, and sample moisture content.

QC Results

The resolution of the detector was determined to be satisfactory by measurement of the manganese Kα peak (full width/half maximum) at 5.9 electron volts (eV). Analysis of the quartz instrument blank did not reveal element concentrations above the limit of detection for the XRF. Results of screening level analysis of SRM 2702 and 2781 were within 30% difference from the values stated in the certificates of analysis for the reference materials. Precision measurements for analysis of four metals were within 20% relative standard deviation (RSD). Results of the QC analysis are included below:

Seattle Iron & Metal QA/QC Analyses, Project Code: ESD-202A

Standard Reference Materials

	Cr	Cr +/-	Cu	Cu +/-	Pb	Pb +/-	Zn	Zn +/-
srm 2781	155	46	590	16	201	7	1204	20
cert value	202	9	627.4	13.5	202.1	6.5	1273	53
% Difference	-23.3		-6.0		-0.5		-5.4	
srm 2702	449	83	105	12	137	7	436	14
cert value	352	22	117.1	5.6	132.8	1.1	485.3	4.2
% Difference	27.6		-10.3		3.2		-10.2	
srm 2702 (repeat)	371	57	85	8	131	5	428	10
cert value	352	22	117.1	5.6	132.8	1.1	485.3	4.2
% Difference	5.4		-27.4		-1.4		-11.8	
SiO2 blank	<LOD	78	<LOD	17	<LOD	7	<LOD	7

Precision Check - Sample 10194002, run for 120 seconds using the standard analysis setting.

Repetition	ppm Cr	ppm Cu	ppm Pb	ppm Zn
1	1457	1541	1385	5803
2	1402	1537	1372	5755
3	1346	1515	1362	5799
4	1510	1560	1360	5749
5	1540	1526	1327	5584
6	1521	1513	1331	5485
7	1575	1554	1332	5535
Average =	1478.7	1535.1	1352.7	5672.9
Standard Deviation =	81.4	18.2	22.8	133.9
Relative SD (%)=	5.5	1.2	1.7	2.4

XRF Screening Results

Screening-level analyses of the samples tested on May 14, 2010, revealed the presence of metals including Cr, Cu, Pb, and Zn. Screening results are displayed below for the elements of interest in units of parts per million (ppm). A complete file including all QC and results of analysis for the full range of elements that were detected is appended to this narrative report.

Date	Time	Sample No.	Cr	Cr +/-	Cu	Cu +/-	Pb	Pb +/-	Zn	Zn +/-
14-May-10	14:14:03	10194000	1632	133	992	30	1299	26	5123	79
14-May-10	14:15:47	10194001	907	145	1232	38	1760	36	8506	137
14-May-10	14:17:36	10194002	1614	127	1713	40	1361	26	5863	88
14-May-10	14:19:41	10194003	409	82	823	24	932	19	4817	69

Figures 2-5 below display annotated XRF spectra collected during the screening level analysis of samples 10194000, 10194001, 10194002, and 10194003.

Figure 2 – XRF spectrum for sample 10194000

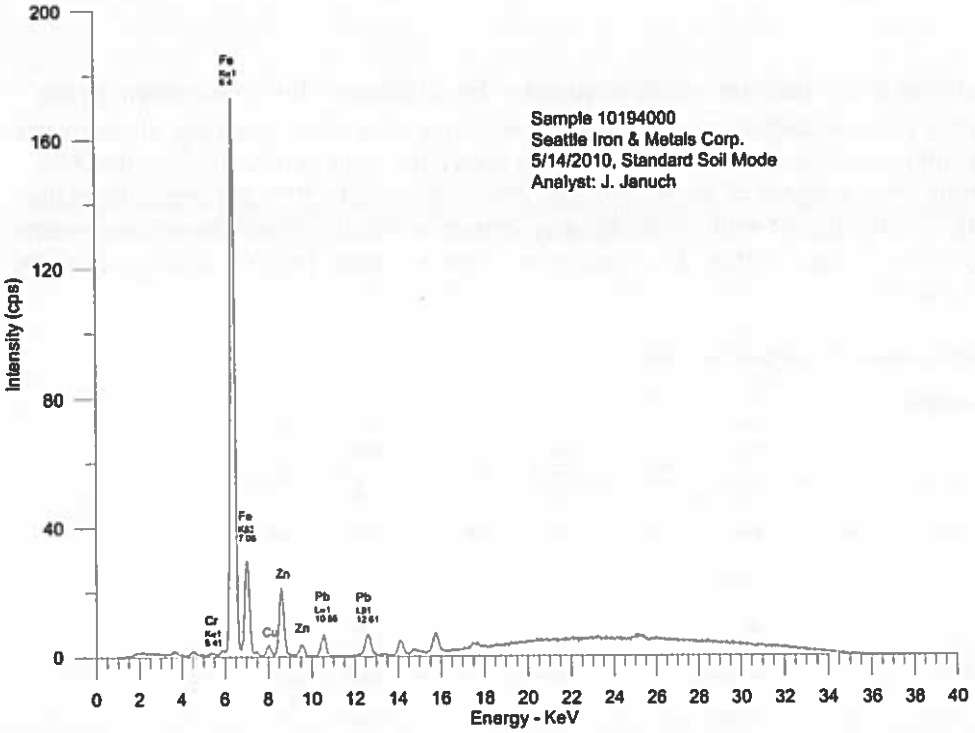


Figure 3 – XRF spectrum for sample 10194001

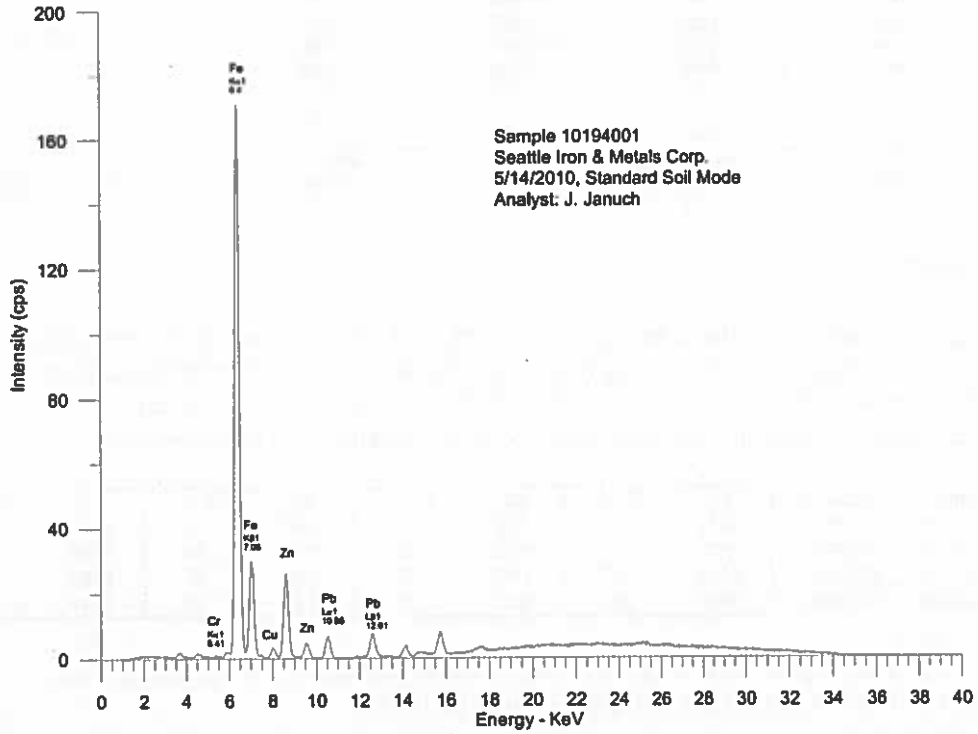


Figure 4 – XRF spectrum for sample 10194002

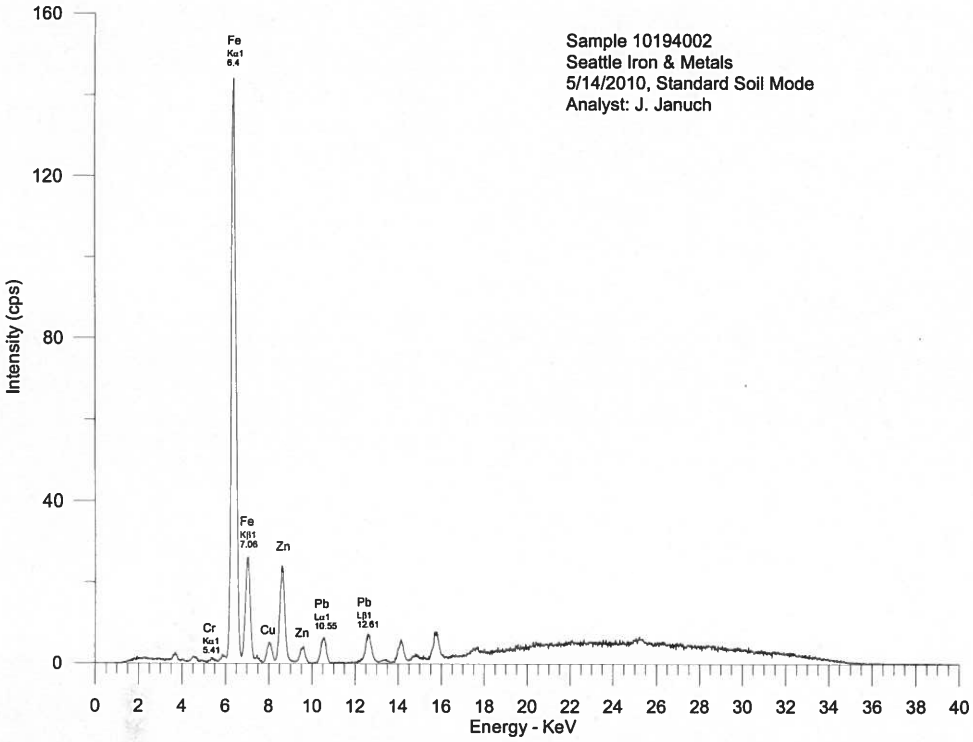
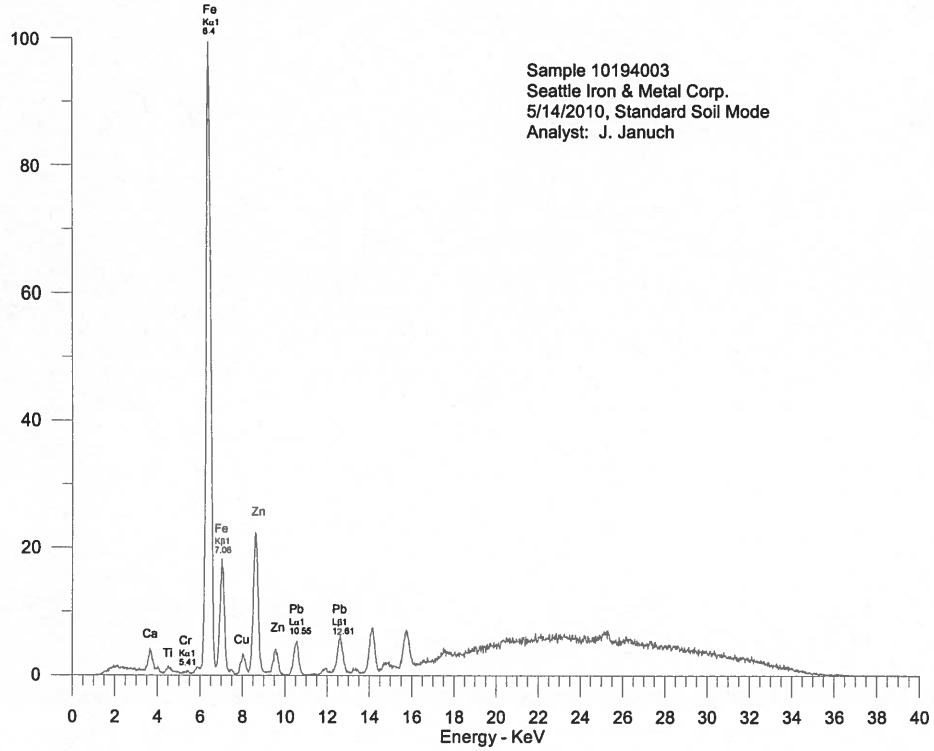


Figure 5 – XRF spectrum for sample 10194003



Pass Fail	Date	Reading	Mode	LiveTime	Match1	Sb	Sb +/-	As	As +/-	Ba	Ba +/-	Br	Br +/-	Cd	Cd +/-	Cr	Cr +/-	Co	Co +/-	Cu
PASS	14-May-10	1	Standardization	30.82	0.019865															
	14-May-10	2	Soil	46.49		<LOD		74	<LOD	53	931	292	NA	<LOD		44	1710	136	1891	171 1044
PASS	14-May-10	3	Standardization	29.11	0.019867															
	14-May-10	4	Soil	45.7		<LOD		49	21	5	<LOD	384	NA	<LOD		31	155	46	400	54 590
	14-May-10	5	Soil	45.66		<LOD		53	<LOD	5	<LOD	242	NA	<LOD		31	<LOD	78	<LOD	19 <LOD
	14-May-10	6	Soil	47.98		<LOD		67	41	6	934	241	NA	<LOD		40	449	83	1160	112 105
	14-May-10	7	Soil	53.35		<LOD		56	<LOD	8	<LOD	236	NA	<LOD		39	<LOD	99	<LOD	30 <LOD
	14-May-10	8	Soil	55.39		<LOD		131	<LOD	21	<LOD	620	NA	<LOD		91	543	139	<LOD	93 <LOD
	14-May-10	9	Soil	45.73		<LOD		52	<LOD	5	<LOD	228	NA	<LOD		31	<LOD	80	<LOD	21 <LOD
	14-May-10	10	Soil	46.54		<LOD		74	82	17	<LOD	854	NA	<LOD		45	1632	133	1929	168 992
	14-May-10	11	Soil	48.01		125		26	107	23	<LOD	1062	NA	<LOD		49	907	145	2176	213 1232
	14-May-10	12	Soil	47.04		<LOD		73	<LOD	52	<LOD	788	NA	<LOD		44	1614	127	1490	153 1713
	14-May-10	13	Soil	47.56		82		22	44	13	743	213	NA	<LOD		40	409	82	866	108 823
PASS	25-May-10	1	Standardization	29.92	0.019871															
	25-May-10	2	Soil	93.17		<LOD		37	<LOD	3	<LOD	165	NA	<LOD		22	<LOD	57	<LOD	14 <LOD
	25-May-10	3	Soil	97.74		<LOD		46	46	4	1119	170	NA	<LOD		28	371	57	951	77 85
	25-May-10	4	Soil	101.57		<LOD		46	<LOD	5	<LOD	232	NA	<LOD		28	<LOD	77	<LOD	29 <LOD
	25-May-10	5	Soil	95.31		<LOD		52	54	12	940	193	NA	<LOD		31	1457	87	1591	107 1541
	25-May-10	6	Soil	95.38		<LOD		51	41	12	983	191	NA		31	10	1402	85	1563	105 1537
	25-May-10	7	Soil	95.25		<LOD		51	77	12	993	192	NA	<LOD		31	1346	85	1721	106 1515
	25-May-10	8	Soil	95.37		<LOD		51	62	12	801	189	NA	<LOD		31	1510	87	1628	106 1560
	25-May-10	9	Soil	95.21		58		17	<LOD	35	557	184	NA	<LOD		30	1540	86	1475	104 1526
	25-May-10	10	Soil	95.18		70		17	<LOD	35	705	187	NA	<LOD		30	1521	86	1753	105 1513
	25-May-10	11	Soil	95.19		53		17	<LOD	35	1037	192	NA	<LOD		30	1575	87	1665	106 1554

Cu	+/-	Fe	Fe +/-	Pb	Pb +/-	Mn	Mn +/-	Hg	Hg +/-	Mo	Mo +/-	Ni	Ni +/-	Pa	Pa +/-	Rb	Rb +/-	Se	Se +/-	Ag	Ag +/-	Sr	
31		171978	2189	1415	27	1818	107	<LOD	24	46	4	166	36	NA		22	2	<LOD		8	<LOD	39	228
16		30509	320	201	7	811	44	<LOD	12	46	3	<LOD	44	NA		29	2		21	2	<LOD	28	237
17		<LOD	32	<LOD	7	<LOD	40	<LOD	9	<LOD	7	<LOD	29	NA		<LOD	3	<LOD		3	<LOD	27	<LOD
12		85531	1028	137	7	1701	82	<LOD	16	<LOD	10	<LOD	68	NA		119	3		9	2	<LOD	35	109
22		78	21	24	4	<LOD	52	<LOD	11	65	4	<LOD	33	NA		20	2	<LOD		4	<LOD	38	36
63		686	92	<LOD	33	<LOD	158	<LOD	28	55	9	<LOD	96	NA		<LOD	13	<LOD		11	<LOD	94	32
17		<LOD	33	<LOD	7	<LOD	43	<LOD	9	<LOD	6	<LOD	28	NA		<LOD	2	<LOD		3	<LOD	27	<LOD
30		165416	2108	1299	26	1773	105	<LOD	23	43	4	165	36	NA		27	2	<LOD		8	<LOD	38	219
38		213989	3070	1760	36	2558	137	<LOD	30	48	4	<LOD	124	NA		30	3	<LOD		9	<LOD	43	203
40		139494	1777	1361	26	1702	100	<LOD	24	37	4	262	35	NA		30	2	<LOD		8	<LOD	38	253
24		81872	982	932	19	1008	70	<LOD	19	25	3	<LOD	71	NA		31	2	<LOD		6	<LOD	35	304
12		<LOD	23	<LOD	5	<LOD	32	<LOD	6	<LOD	5	<LOD	21	NA		<LOD	2	<LOD		2	<LOD	19	<LOD
8		84479	713	131	5	1725	57	<LOD	10	11	2	<LOD	47	NA		120	2		8	1	<LOD	25	112
17		734	26	<LOD	7	<LOD	45	<LOD	9	<LOD	6	<LOD	27	NA		<LOD	3	<LOD		3	<LOD	25	256
26		139446	1254	1385	19	1619	69	<LOD	17	36	3	235	24	NA		24	2	<LOD		5	<LOD	27	274
26		137281	1222	1372	18	1701	69	<LOD	17	38	3	228	24	NA		22	1	<LOD		5	<LOD	27	270
26		137637	1230	1362	18	1555	67	<LOD	17	33	3	216	24	NA		21	1	<LOD		5	<LOD	27	273
26		138254	1234	1360	18	1549	68	<LOD	16	38	3	203	24	NA		23	1	<LOD		5	<LOD	27	272
26		136899	1210	1327	18	1499	66	<LOD	17	39	3	225	24	NA		21	1	<LOD		5	<LOD	27	258
26		136801	1208	1331	18	1564	67	<LOD	16	36	3	199	24	NA		24	1	<LOD		5	<LOD	26	261
26		137465	1220	1332	18	1484	67	<LOD	15	37	3	210	24	NA		21	1	<LOD		5	<LOD	27	266

Sr +/-	Sn	Sn +/-	Ti	Ti +/-	Date	Date	Zn	Zn +/-	Zr	Zr +/-	LE	LE +/-	Time	Analyst	Sample ID	Sample Type	Depth
					14-May-10	14-May-10							13:12:59				
5	143	25	7391	799	14-May-10	14-May-10	5244	81	201	5	<LOD	0	13:21:18	Jed Januch	bag prep test	Bagged	
					14-May-10	14-May-10							13:39:06				
4	<LOD	49	3681	363	14-May-10	14-May-10	1204	20	281	4	<LOD	0	13:45:28	Jed Januch	srm 2781	Standard	
3	<LOD	51	<LOD	602	14-May-10	14-May-10	<LOD	7	<LOD	5	<LOD	0	13:51:31	Jed Januch	SiO2 blank	Standard	
3	<LOD	66	11740	719	14-May-10	14-May-10	436	14	300	6	<LOD	0	13:56:14	Jed Januch	srm 2702	Standard	
2	<LOD	57	<LOD	580	14-May-10	14-May-10	72	7	61	3	<LOD	0	14:02:45	Jed Januch	bag	Bagged	
6	<LOD	135	<LOD	1684	14-May-10	14-May-10	43	14	73	8	<LOD	0	14:04:55	Jed Januch	bag	Bagged	
3	<LOD	50	<LOD	574	14-May-10	14-May-10	<LOD	7	<LOD	5	<LOD	0	14:06:47	Jed Januch	SiO2	Standard	
5	124	24	8789	802	14-May-10	14-May-10	5123	79	208	5	<LOD	0	14:14:03	Jed Januch	10194000	Bagged	
6	89	26	9286	979	14-May-10	14-May-10	8506	137	319	7	<LOD	0	14:15:47	Jed Januch	10194001	Bagged	
6	116	24	8152	749	14-May-10	14-May-10	5863	88	226	5	<LOD	0	14:17:36	Jed Januch	10194002	Bagged	
6	72	21	4565	577	14-May-10	14-May-10	4817	69	166	4	<LOD	0	14:19:41	Jed Januch	10194003	Bagged	
					25-May-10	25-May-10							15:50:32				
2	<LOD	36	<LOD	411	25-May-10	25-May-10	<LOD	5	4	1	<LOD	0	15:53:48	Jed Januch	SiO2	Standard	
2	<LOD	45	11633	504	25-May-10	25-May-10	428	10	292	4	<LOD	0	15:57:55	Jed Januch	SRM 2702	Standard	
4	<LOD	45	<LOD	609	25-May-10	25-May-10	8	3	6	2	<LOD	0	16:02:48	Jed Januch	Plastic Zip Lock Blank	Bagged	
4	134	17	6974	528	25-May-10	25-May-10	5803	61	233	4	<LOD	0	16:15:00	Jed Januch	Sample No. 10194002 Rep 1	Bagged	
4	141	17	6851	521	25-May-10	25-May-10	5755	60	225	4	<LOD	0	16:18:07	Jed Januch	Sample No. 10194002 Rep 2	Bagged	
4	110	17	7152	527	25-May-10	25-May-10	5799	61	231	4	<LOD	0	16:21:16	Jed Januch	Sample No. 10194002 Rep 3	Bagged	
4	93	17	7139	522	25-May-10	25-May-10	5749	60	232	4	<LOD	0	16:23:47	Jed Januch	Sample No. 10194002 Rep 4	Bagged	
4	150	17	7829	518	25-May-10	25-May-10	5584	58	209	4	<LOD	0	16:26:48	Jed Januch	Sample No. 10194002 Rep 5	Bagged	
4	120	17	7979	524	25-May-10	25-May-10	5485	58	205	4	<LOD	0	16:30:08	Jed Januch	Sample No. 10194002 Rep 6	Bagged	
4	137	17	7422	529	25-May-10	25-May-10	5535	58	208	4	<LOD	0	16:33:18	Jed Januch	Sample No. 10194002 Rep 7	Bagged	

field5	field6	field7	field8	MN1	Pass/Fail
				229	-0.022334
				231	-0.026369

Seattle Iron & Metal QA/QC Analyses, Project Code: ESD-202A

Standard Reference Materials

	Cr	Cr +/-	Cu	Cu +/-	Pb	Pb +/-	Zn	Zn +/-
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cert value	202	9	627.4	13.5	202.1	6.5	1273	53
% Difference	-23.3		-6.0		-0.5		-5.4	
srm 2702	449	83	105	12	137	7	436	14
cert value	352	22	117.1	5.6	132.8	1.1	485.3	4.2
% Difference	27.6		-10.3		3.2		-10.2	
srm 2702 (repeat)	371	57	85	8	131	5	428	10
cert value	352	22	117.1	5.6	132.8	1.1	485.3	4.2
% Difference	5.4		-27.4		-1.4		-11.8	
SiO2 blank	<LOD	78	<LOD	17	<LOD	7	<LOD	7

Precision Check - Sample 10194002, run for 120 seconds using the standard analysis setting.

Repetition	ppm Cr	ppm Cu	ppm Pb	ppm Zn
1	1457	1541	1385	5803
2	1402	1537	1372	5755
3	1346	1515	1362	5799
4	1510	1560	1360	5749
5	1540	1526	1327	5584
6	1521	1513	1331	5485
7	1575	1554	1332	5535
Average =	1478.7	1535.1	1352.7	5672.9
Standard Deviation =	81.4	18.2	22.8	133.9
Relative SD (%)=	5.5	1.2	1.7	2.4

ATTACHMENT G

Photograph Documentation

All photographs were taken by Dave Terpening on April 29th, 2010 or May 11th, 2010.

Photo #1: Facing southwest, photograph of the entrance/exit to SIM (photo taken April 29th.)

Photo #2: Facing southeast, photograph of the south dock where barges usually unload material.

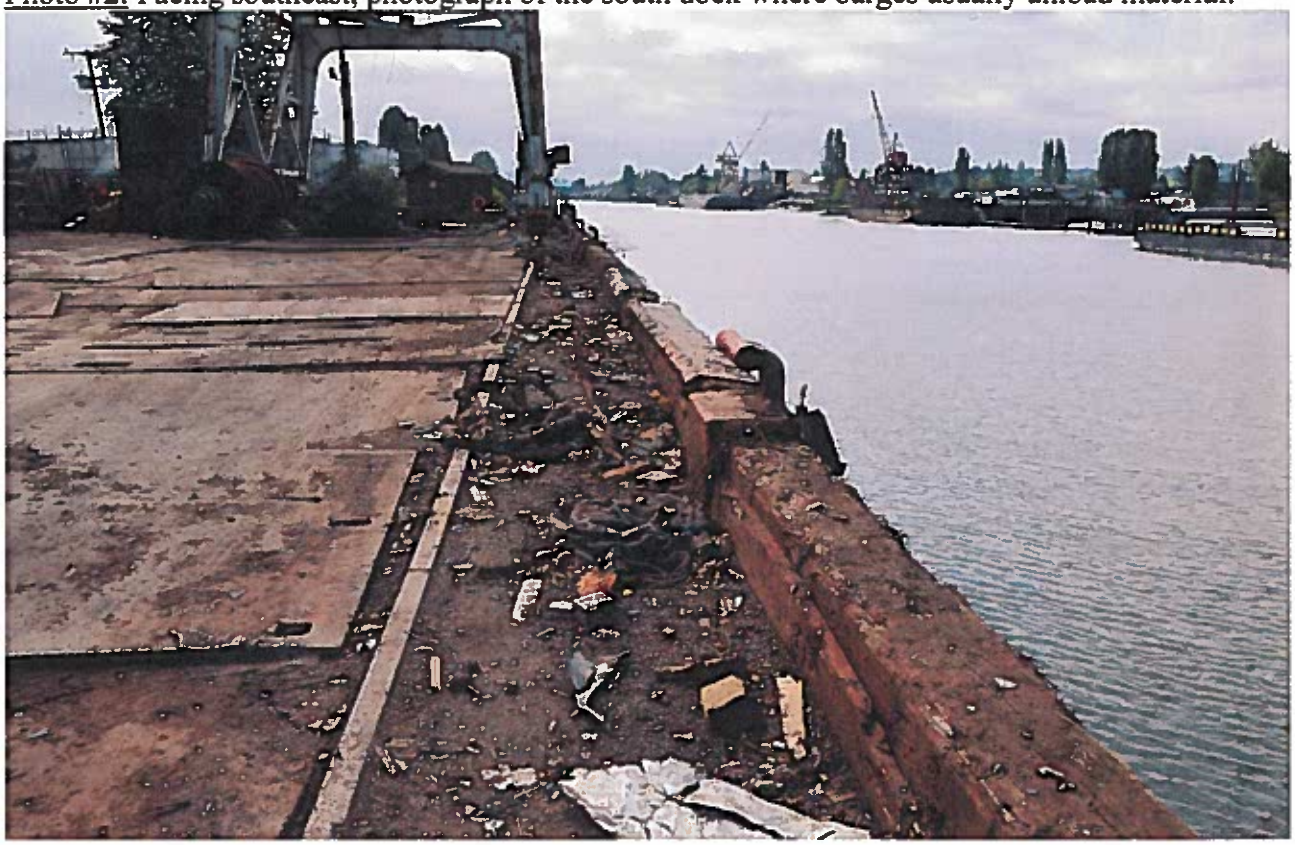

Photo #3: Facing east, photograph of on-site stormwater catch basins.

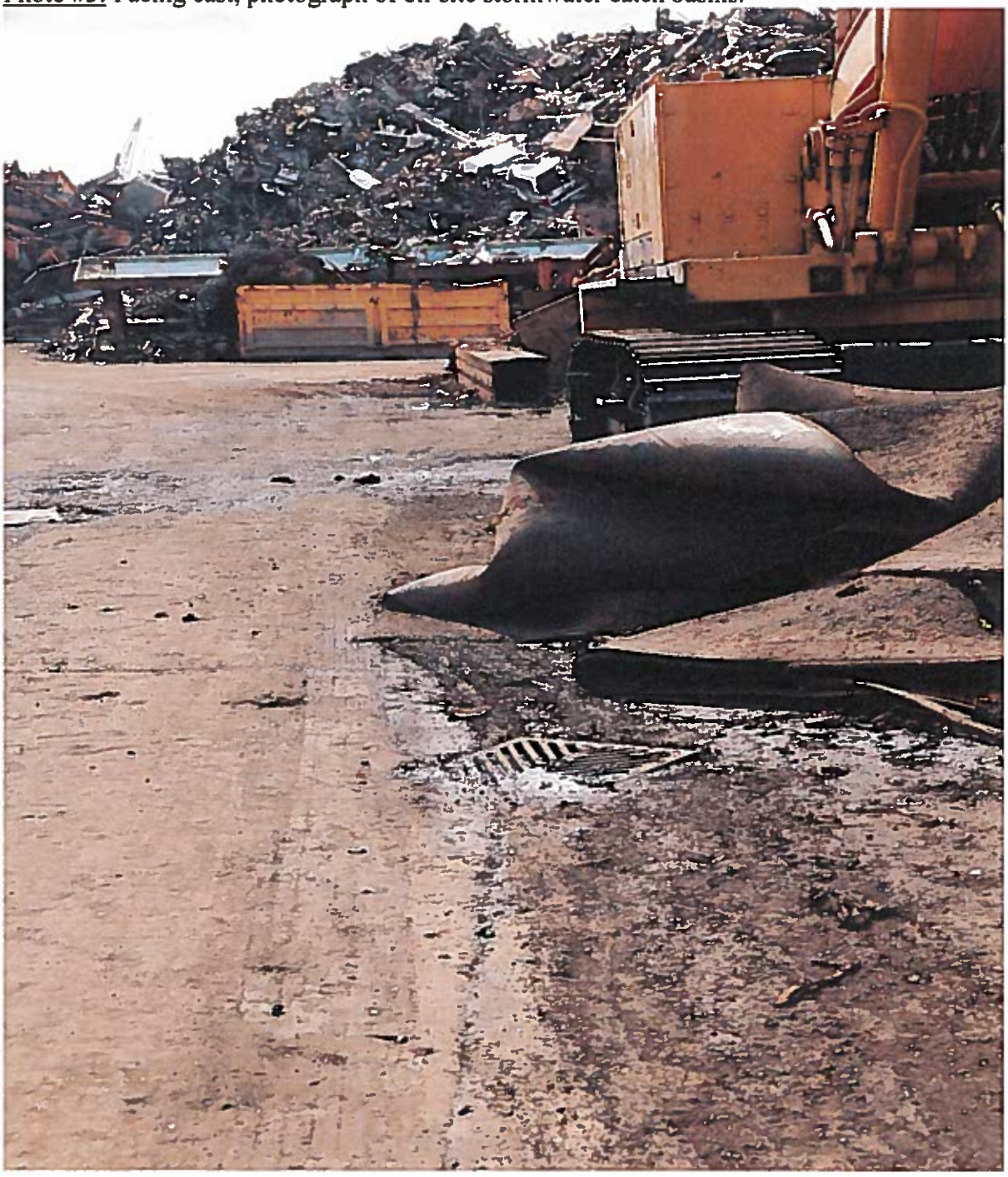

Photo #4: Facing east, photograph of the chemical reaction tanks used in the treatment process.

Photo #5: Facing east, photograph shredding process done at the facility.

Copy to Margaret 7/19

City of Seattle – Seattle Public Utilities
Seattle Municipal Tower (SMT)
700 Fifth Avenue, Suite 4900
P.O. Box 34018
Seattle, WA 98124-4018

File Number: 2010-013
Date: July 7, 2010

SEATTLE PUBLIC UTILITIES
NOTICE OF VIOLATION
AND
ORDER FOR CORRECTIVE ACTION AND PENALTY

Name: Seattle Iron and Metals Corporation
Attn: Eric Paul

Address: 601 S Myrtle St
Seattle, WA 98108

On May 11, 2010, Seattle Public Utilities (SPU) collected sediment samples from two roofs (RD-1 and RD-2), the catch basin located in the employee parking lot (CB157), and the catch basin on S Myrtle St adjacent to the Seattle Iron and Metals driveway entrance (RCB189) during a joint inspection at Seattle Iron and Metals conducted with the U.S. Environmental Protection Agency (see attached map of sampling locations). Runoff from these areas discharges untreated to the City-owned storm drains on S Myrtle St and S Garden St. Preliminary laboratory results indicate that the samples contain elevated levels of metals and PCBs:

	Sampling Stations					Screening Criteria[a]	
Pollutant (mg/kg)	RD-1	RD-2	CB157F[b]	CB157S[c]	RCB189F[b]	SQS/LAET[d]	CSL/2LAET[e]
Copper	1,090	975	1,890	2,240	3,280	390	390
Lead	1,410	1,700	1,260	1,380	904	450	530
Mercury	0.92	2.56	0.80	1.55	0.66	0.41	0.59
Zinc	5,370	8,310	4,940	5,880	3,890	410	960
Total PCBs	1.93	4.87	2.96	4.02	2.95	0.13	1.0

a. Criteria used to screen storm drain sediment for contaminants are based on the state sediment management standards (WAC 173-204)
b. Sample collected from the filter sock installed in the catch basin
c. Sample collected from the catch basin sump
d. Sediment quality standard/lowest apparent effects threshold
e. Cleanup screening level/second lowest apparent effects threshold

The catch basin located on the south side of S Myrtle St near the Seattle Iron and Metals main driveway also contained a large amount of sediment and there was dirt and debris along the south curb line of the roadway, indicating that dirt and debris tracked out onto the roadway from trucks leaving the site continues to be a problem and that current street sweeping practices are not adequate. SPU jetted and cleaned this catch basin and all of the storm drain lines and other catch basins on S Myrtle St, S Garden St, Fox Ave S, and 7th Ave S in December 2009-January 2010.

CODE VIOLATION:

a. ***SMC 22.802.020.A. Prohibited discharges***
The following common substances are prohibited to enter, either directly or indirectly, a public drainage system, a private drainage system, or a receiving water within or contiguous to Seattle city limits,

including but not limited to when entering via a service drain, overland flow, or as a result of a spill or deliberate dumping:

6. *Chemicals not normally found in uncontaminated water.*
23. *Metals in excess of naturally occurring amounts, whether in liquid or solid form.*

As explained above, SPU found elevated levels of metals and PCBs in the sediment samples collected on May 11, 2010 from the roof drains and employee parking lot drainage system that discharge untreated to the City-owned storm drains on S Myrtle St and S Garden St. These same contaminants were elevated in an earlier sample collected on September 9, 2008, from a maintenance hole on the S Myrtle St storm drain located immediately downstream of where the roof drain from the maintenance building enters the system, which indicates that these pollutants are entering the public storm drain system:

Copper:	500 mg/kg
Lead:	675 mg/kg
Mercury:	1.88 mg/kg
Zinc:	2,420 mg/kg
PCBs:	2,560 ug/kg dw

b. ***SMC 22.803.040.A. Minimum requirements for source controls for all businesses and public entities*** *Source controls shall be implemented to the extent allowed by law, by all businesses and public entities for specific pollution-generating activities as specified in the joint SPU/DPD Directors' Rule, "Source Control Technical Requirements Manual", to the extent necessary to prevent prohibited discharges as described in Subsection 22.802.020.A through Subsection 22.802.020.C, and to prevent contaminants from coming into contact with drainage water.*

The July 10, 2009 corrective action letter from SPU identified track out as a problem and directed Seattle Iron and Metals to take action to eliminate track out of sediment/dirt from your facility. The elevated levels of contaminants recently found in the City-owned catch basin on S Myrtle St (RCB189) and the large volume of sediment that has accumulated in this structure in the 5 months since SPU last cleaned the system indicate that contaminated dirt and debris continues to be tracked onto the adjacent public right-of-way on S Myrtle St by trucks leaving the site and is adversely affecting City infrastructure. Dirt and debris were also observed along the south side of S Myrtle St immediately east of your driveway during the May 11, 2010 site visit, which indicates that sweeping practices have not been effective in keeping contaminated material from leaving the site and entering the City-owned storm drain system on S Myrtle St.

CORRECTIVE ACTION REQUIRED:

1. Take immediate action to reduce the amount of dirt and other debris tracked out onto S Myrtle St from trucks leaving the site by employing more aggressive street sweeping or other means.
2. By August 9, 2010:
   - Submit a plan to SPU describing how the illicit discharge from rooftops and the employee parking lot will be eliminated, including a description of how the amount of dirt and debris tracked out onto the City right-of-way will be controlled, as well as a long term monitoring plan to document that contaminated material does not discharge to the City storm drain system in the future.
   - Jet and clean the City storm drain lines and associated catch basins on S Myrtle St and S Garden St to remove all contaminated sediment.
3. By October 12, eliminate the illicit discharge.

PENALTY:

Pursuant to SMC 22.808.050, the penalty for the prohibited discharge has been assessed at $500. This penalty is due within 30 days to the address provided on the attached invoice.

Pursuant to SMC 22.808.050, a penalty of $1,500 is hereby imposed for failing to implement appropriate source controls as cited above. This penalty is suspended pending completion of the corrective action by the required deadline of, and will be waived if compliance is achieved by that deadline. If compliance is not achieved by the date set forth above, additional penalties may be assessed.

Beth, Schmoyer, Lower Duwamish Waterway source control lead	(206) 386-1199 Phone Number	beth.schmoyer@seattle.gov Email
Ellen Stewart, Source Control Supervisor	(206) 615-0023 Phone Number	ellen.stewart@seattle.gov Email

SEE REVERSE SIDE FOR INSTRUCTIONS

NOTICE OF VIOLATION AND ORDER CODE AUTHORITY
Stormwater Code Enforcement - Ch. 22.800-22.808 SMC

1) If you have questions or don't understand the violation or what is necessary to correct it, contact Seattle Public Utilities. You may call the Inspector whose name, phone number and email are on this notice.

2) The Notice of Violation and Order shall be final and not subject to further appeal unless an aggrieved party requests in writing a review by the Director within **ten (10) days** after service of the Notice of Violation and Order. When the last day of the period so computed is a Saturday, Sunday or federal or City holiday, the period shall run until 5:00 p.m. on the next business day. (SMC 22.808.030.D).

   Send request to:

   Ellen Stewart
   Seattle Public Utilities
   700 5th Avenue, Suite 4900
   POB 34018
   Seattle, WA 98124-4018

3) If a responsible party fails to correct a violation or pay a penalty as required by a Notice of Violation, or fails to comply with a Director's order, the Director shall refer the matter to the City Attorney's Office for civil or criminal enforcement action (SMC 22.808.030.E).

4) In addition to penalties, these violations and failure to complete the corrective work may result in responsible party liability for City costs of corrective action and abatement, investigation costs, costs to correct the violations or other cost expenses, and loss or damage incurred by the City, plus a surcharge of 15% for administrative costs, as set forth in SMC 22.808.050 -.060 and -.070.

PERMITS

If permits are required for compliance with this order, permitting information may be obtained at:

Side Sewer Permits:
Department of Planning and Development
Applicant Services Center
700 Fifth Avenue, Suite 2000 (20th Floor Seattle Municipal Tower)
Phone: 206-684-8850

Plumbing Permits:
Seattle/King County Public Health
401 5th Ave, Suite 1100 (11th Floor Chinook Building)
Phone: 206-296-1175

Please bring this document with you when applying for any permits. The date set for compliance in a Notice of Violation and Order takes precedence over work completion dates specified in any permit(s).

NOTICE OF VIOLATION AND ORDER PENALTY PAYMENT

See attached invoice for payment instructions.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10 LABORATORY
7411 Beach Dr. East
Port Orchard, Washington 98366

QUALITY ASSURANCE MEMORANDUM FOR INORGANIC CHEMICAL ANALYSES

DATE: August 24, 2010

TO: Jon Klemesrud, Project Manager
Office of Compliance and Enforcement, US EPA Region 10

From: Stephanie Le, Chemist
Office of Environmental Assessment, US EPA Region 10 Laboratory

SUBJECT: Quality Assurance Review of Seattle Iron and Metals samples
For Total Metals

Project Code: ESD-202A
Account Code: 1011B10P501E50C

CC: Dave Terpening, Inspector
Office of Compliance and Enforcement, US EPA Region 10

The following is a quality assurance review of the results of the analyses of 4 solid samples for Total Metals. These samples were submitted for the Seattle Iron and Metals Project. The analyses were performed by EPA chemists at the US EPA Region 10 Laboratory in Port Orchard, WA, following US EPA and Laboratory guidelines.

This review was conducted for the following samples:

10194000 10194001 10194002 10194003

Data Qualifications

Comments below refer to the quality control specifications outlined in the Laboratory's current Quality Assurance Manual, Standard Operating Procedures (SOPs) and the Quality Assurance Project Plan (QAPP). No excursions were required from the method Standard Operating Procedure.

All measures of quality control met Laboratory/QAPP criteria.

For those tests for which the USEPA Region 10 Laboratory has been accredited by the National Environmental Laboratory Accreditation Conference (NELAC), all requirements of the current NELAC Standard have been met.

1. Sample Transport and Receipt

Upon sample receipt, all conditions met Laboratory/QAPP requirements for this project.

2. Sample Holding Times

The concentration of an analyte in a sample or sample extract may increase or decrease over time depending on the nature of the analyte. For this reason, holding time limits are recommended for samples. The samples covered by this review met method holding time recommendations.

3. Sample Preparation

Samples were prepared according to the method outlined in the SOP for these analytes for this type of matrix. No qualification of the data was required based on sample preparation.

4. Initial Calibration and Calibration Verification

The calibration factors generated for the initial calibration met method criteria. All calibration verification checks met the frequency and recovery criteria on the day of analysis. No qualification was required based on calibration or calibration verification.

5. Laboratory Control Samples

All laboratory control sample results met the recovery acceptance criterion (85 – 115% of the standard's true value) for the method. No qualification was required based on laboratory control sample analysis.

6. Blank Analysis

The method blank did not contain detectable levels of analyte which would require data qualification.

7. Duplicate Analysis

Duplicate analysis was performed on sample 10194000. Sample results which were greater than the Low Range Standard level were within the ± 20% RPD requirement. No qualification was required based on duplicate analysis.

8. Matrix Spike/Matrix Spike Duplicate Analysis

Matrix spike analyses were performed on sample 10194000. Sample results were within the 75-125% recovery and relative percent difference (RPD) requirements. If the spike amount added is less than one quarter of the sample concentration, the recovery is reported "NA" and the results are not qualified. No other qualification was required based on matrix spike analyses.

9. Reference Materials

A reference material was prepared and analyzed with the Total Metals samples. Analytical values for this sample were within the range of acceptable results. No qualification was necessary based on analysis of the reference material.

10. Interferences

These samples contained high levels of metals, many of which caused interferences of various kinds. Many of these interferences had to be addressed by analyzing the samples at a dilution.

11. Reporting Limits

All sample results that fall below the MRL are assigned the value of the MRL and the 'U' qualifier is attached.

12. Data Qualifiers

The U qualifier was attached to results below the reporting limit.

Below are the definitions for the codes used qualifying data from these analyses. When more than one quality issue was involved, the most restrictive qualifier has been attached to the data.

U - The analyte was not detected at or above the reported value.

NA - Not Applicable; the parameter was not included in the analysis, or there is no analytical result for this parameter. No value is reported with this qualification.

The usefulness of qualified data should be treated according to the severity of the qualifier in light of the project's data quality objectives. Should questions arise regarding the data, contact Katie Adams at the Region 10 Laboratory, phone number (360) 871- 8748.

13. Definitions

Accuracy - the degree of conformity of a measured or calculated quantity to its actual value.

Duplicate Analysis – when a duplicate of a sample (DS), a matrix spike (MSD), or a laboratory control sample (LCSD) is analyzed, it is possible to use the comparison of the results in terms of relative percent difference (RPD) to calculate precision.

Laboratory Control Sample (LCS) - a clean matrix spiked with known quantities of analytes. The LCS is processed with samples through every step of preparation and analysis. Measuring percent recovery of each analyte in the LCS provides a measurement of accuracy for the analyte in the project samples. A laboratory control sample is prepared and analyzed at a frequency no less than one for every 20 project samples.

Matrix Spike/Matrix Spike Duplicate (MS/MSD) - Sample analyses performed to provide information about the effect of the sample matrix on analyte recovery and measurement within the project samples. To create the MS/MSD, a project sample is spiked with known quantities of analytes and the percent recoveries of the analytes are determined.

Method Blank- An analytical control that is carried through the entire analytical procedure. The method blank is used to define the level of laboratory background and reagent contamination. A method blank is prepared and analyzed for every batch of samples at a minimum frequency of one per every 20 samples. To produce unqualified data, the result of the method blank analysis is required to be less than the MRL and less than 10 times the amount of analyte found in any project sample.

Minimum Reporting Level (MRL) - the smallest measured concentration of a substance that can be reliably measured using a given analytical method.

Precision – the degree of mutual agreement or repeatability among a series of individual results.

Reference materials – Samples with analyte values that are homogeneous and well established. This allows the reference material to be used to assess the accuracy of the measurement method.

Relative Percent Difference – The difference between two sample results divided by their mean and expressed as a percentage.

Manchester Environmental Laboratory
Report by Parameter for Project ESD-202A

Project Code:	ESD-202A	**Collected:**	5/11/10	**11:45:00**
Project Name:	SEATTLE IRON & METAL CORP.	**Matrix:**	Solid	
Project Officer:	JON KLEMESRUD	**Sample Number:**	10194000	
Account Code:	1011B10P501E50C	**Type:**	Reg sample	
Station Description:	MAIN OFFICE ROOF RD#1 SEATTLE IRON METAL			

		Result	Units	Qlfr
MET				
Parameter	: Metals, ICP-SAS	Dry Weight		Container ID : N1
Method	: 200.7 ICP Inductively Coupled Plasma-Atomic Emission Spectroscopy (22 elements)			Analysis Date : 6/28/2010
Prep Method	: 200.2 Metals, total recoverable, water, soil, EMSL-CIN			Prep Date : 6/24/2010
Analytes(s):	**7440508 Copper**	**1140**	**mg/kg**	
	7439921 Lead	**1340**	**mg/kg**	
	7440666 Zinc	**4900**	**mg/kg**	

Manchester Environmental Laboratory
Report by Parameter for Project ESD-202A

Project Code:	ESD-202A	**Collected:**	
Project Name:	SEATTLE IRON & METAL CORP.	**Matrix:**	Solid
Project Officer:	JON KLEMESRUD	**Sample Number:**	10194000
Account Code:	1011B10P501E50C	**Type:**	Duplicate
Station Description:			

	Result	Units	Qlfr

MET

Parameter : Metals, ICP-SAS — Dry Weight — Container ID : N1

Method : 200.7 — ICP Inductively Coupled Plasma-Atomic Emission Spectroscopy (22 elements) — Analysis Date : 6/28/2010

Prep Method : 200.2 — Metals, total recoverable, water, soil, EMSL-CIN — Prep Date : 6/24/2010

Analytes(s):	**7440508**	**Copper**	**1180**	**mg/kg**
	7439921	**Lead**	**1330**	**mg/kg**
	7440666	**Zinc**	**4800**	**mg/kg**

Manchester Environmental Laboratory
Report by Parameter for Project ESD-202A

Project Code:	ESD-202A	**Collected:**	
Project Name:	SEATTLE IRON & METAL CORP.	**Matrix:**	Solid
Project Officer:	JON KLEMESRUD	**Sample Number:**	10194000
Account Code:	1011B10P501E50C	**Type:**	Matrix Spike
Station Description:			

	Result	Units	Qlfr

MET

Parameter : Metals, ICP-SAS — Dry Weight — Container ID : N1

Method : 200.7 — ICP Inductively Coupled Plasma-Atomic Emission Spectroscopy (22 elements) — Analysis Date : 6/28/2010

Prep Method : 200.2 — Metals, total recoverable, water, soil, EMSL-CIN — Prep Date : 6/24/2010

Analytes(s):	7440508	Copper	NA
	7439921	Lead	NA
	7440666	Zinc	NA

Manchester Environmental Laboratory
Report by Parameter for Project ESD-202A

Project Code:	ESD-202A	**Collected:**	
Project Name:	SEATTLE IRON & METAL CORP.	**Matrix:**	Solid
Project Officer:	JON KLEMESRUD	**Sample Number:**	10194000
Account Code:	1011B10P501E50C	**Type:**	Matrix Spike Dupl
Station Description:			

	Result	Units	Qlfr

MET

Parameter : Metals, ICP-SAS — Dry Weight — Container ID : N1

Method : 200.7 — ICP Inductively Coupled Plasma-Atomic Emission Spectroscopy (22 elements) — Analysis Date : 6/28/2010

Prep Method : 200.2 — Metals, total recoverable, water, soil, EMSL-CIN — Prep Date : 6/24/2010

Analytes(s):	7440508	Copper	NA
	7439921	Lead	NA
	7440666	Zinc	NA

Manchester Environmental Laboratory
Report by Parameter for Project ESD-202A

Project Code:	ESD-202A	**Collected:**	5/11/10	**12:20:00**
Project Name:	SEATTLE IRON & METAL CORP.	**Matrix:**	Solid	
Project Officer:	JON KLEMESRUD	**Sample Number:**	10194001	
Account Code:	1011B10P501E50C	**Type:**	Reg sample	
Station Description:	MAINTENANCE ROOF GUTTER RD#2			

	Result	Units	Qlfr

MET

Parameter : Metals, ICP-SAS — Dry Weight — Container ID : N1

Method : 200.7 — ICP Inductively Coupled Plasma-Atomic Emission Spectroscopy (22 elements) — Analysis Date : 6/28/2010

Prep Method : 200.2 — Metals, total recoverable, water, soil, EMSL-CIN — Prep Date : 6/24/2010

Analytes(s):	**7440508**	**Copper**	**1050**	**mg/kg**
	7439921	**Lead**	**1710**	**mg/kg**
	7440666	**Zinc**	**7520**	**mg/kg**

Manchester Environmental Laboratory
Report by Parameter for Project ESD-202A

Project Code:	ESD-202A	**Collected:**	5/11/10	**12:55:00**
Project Name:	SEATTLE IRON & METAL CORP.	**Matrix:**	Solid	
Project Officer:	JON KLEMESRUD	**Sample Number:**	10194002	
Account Code:	1011B10P501E50C	**Type:**	Reg sample	
Station Description:	EMPLOYEE PARKING LOT CATCH BASIN CBPL			

		Result	Units	Qlfr

MET

Parameter : Metals, ICP-SAS — Dry Weight — Container ID : N1

Method : 200.7 — ICP Inductively Coupled Plasma-Atomic Emission Spectroscopy (22 elements) — Analysis Date : 6/28/2010

Prep Method : 200.2 — Metals, total recoverable, water, soil, EMSL-CIN — Prep Date : 6/24/2010

Analytes(s):	**7440508**	**Copper**	**1950**	**mg/kg**
	7439921	**Lead**	**1150**	**mg/kg**
	7440666	**Zinc**	**4780**	**mg/kg**

Manchester Environmental Laboratory
Report by Parameter for Project ESD-202A

Project Code:	ESD-202A	**Collected:**	5/11/10	**13:20:00**
Project Name:	SEATTLE IRON & METAL CORP.	**Matrix:**	Solid	
Project Officer:	JON KLEMESRUD	**Sample Number:**	10194003	
Account Code:	1011B10P501E50C	**Type:**	Reg sample	
Station Description:	CATCH BASIN MYRTLE ST NW OF MAIN OFFICE			

		Result	Units	Qlfr
MET				
Parameter	: Metals, ICP-SAS	Dry Weight		Container ID : N1
Method	: 200.7	ICP Inductively Coupled Plasma-Atomic Emission Spectroscopy (22 elements)		Analysis Date : 6/28/2010
Prep Method	: 200.2	Metals, total recoverable, water, soil, EMSL-CIN		Prep Date : 6/24/2010
Analytes(s):	**7440508**	**Copper**	**861**	**mg/kg**
	7439921	**Lead**	**912**	**mg/kg**
	7440666	**Zinc**	**4380**	**mg/kg**

Manchester Environmental Laboratory
Report by Parameter for Project ESD-202A

Project Code:	ESD-202A	**Collected:**	
Project Name:	SEATTLE IRON & METAL CORP.	**Matrix:**	Solid
Project Officer:	JON KLEMESRUD	**Sample Number:**	IS062410A
Account Code:	1011B10P501E50C	**Type:**	Blank
Station Description:			

			Result	Units	Qlfr
MET					
Parameter	: Metals, ICP-SAS		Dry Weight		Container ID :
Method	: 200.7	ICP Inductively Coupled Plasma-Atomic Emission Spectroscopy (22 elements)			Analysis Date : 6/28/2010
Prep Method	: 200.2	Metals, total recoverable, water, soil, EMSL-CIN			Prep Date : 6/24/2010
Analytes(s):	7440508	Copper	0.50	mg/kg	U
	7439921	Lead	3.0	mg/kg	U
	7440666	Zinc	0.50	mg/kg	U

Manchester Environmental Laboratory
Report by Parameter for Project ESD-202A

Project Code:	ESD-202A	**Collected:**	
Project Name:	SEATTLE IRON & METAL CORP.	**Matrix:**	Solid
Project Officer:	JON KLEMESRUD	**Sample Number:**	IS062410A
Account Code:	1011B10P501E50C	**Type:**	LCS
Station Description:			

	Result	Units	Qlfr

MET

Parameter : Metals, ICP-SAS — Dry Weight — Container ID :

Method : 200.7 — ICP Inductively Coupled Plasma-Atomic Emission Spectroscopy (22 elements) — Analysis Date : 6/28/2010

Prep Method : 200.2 — Metals, total recoverable, water, soil, EMSL-CIN — Prep Date : 6/24/2010

Surrogate(s :	7440508	Copper	102	%Rec
	7439921	Lead	102	%Rec
	7440666	Zinc	100	%Rec

Manchester Environmental Laboratory
Report by Parameter for Project ESD-202A

Project Code:	ESD-202A	**Collected:**	
Project Name:	SEATTLE IRON & METAL CORP.	**Matrix:**	Solid
Project Officer:	JON KLEMESRUD	**Sample Number:**	IS062410A
Account Code:	1011B10P501E50C	**Type:**	LCSD
Station Description:			

	Result	Units	Qlfr

MET

Parameter : Metals, ICP-SAS — Dry Weight — Container ID :

Method : 200.7 — ICP Inductively Coupled Plasma-Atomic Emission Spectroscopy (22 elements) — Analysis Date : 6/28/2010

Prep Method : 200.2 — Metals, total recoverable, water, soil, EMSL-CIN — Prep Date : 6/24/2010

Surrogate(s :	7440508	Copper	102	%Rec
	7439921	Lead	101	%Rec
	7440666	Zinc	99	%Rec

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10 LABORATORY
7411 Beach Dr. East
Port Orchard, Washington 98366

QUALITY ASSURANCE MEMORANDUM FOR ORGANIC CHEMICAL ANALYSES

Date: September 1, 2010

To: Jon Klemesrud, Project Manager
Office of Compliance and Enforcement, USEPA Region 10

From: Gerald Dodo, Chemist
Office of Environmental Assessment, USEPA Region 10 Laboratory

CC: Dave Terpening, Project Manager
Office of Compliance and Enforcement, USEPA Region 10

Subject: Quality Assurance Review for the Total Petroleum Hydrocarbon - Diesel Range Extended Analysis of Samples from the Seattle Iron and Metals Project

Project Code: ESD-202A
Account Code: 1011B10P501E50C

The following is a quality assurance review of the data for total petroleum hydrocarbon - diesel range extended (TPH-Dx) analysis samples from the above referenced site. The preparation and analyses were performed by the USEPA Region 10 Laboratory staff using modified EPA SW846 method 3550 and Washington State Department of Ecology Method NWTPH-Dx.

This review was conducted for the following samples:

10194000	10194001	10194002	10194003

1. Data Qualifications

Comments below refer to the quality control specifications outlined in the Laboratory's current Quality Assurance Manual, Standard Operating Procedures (SOPs) and the Quality Assurance Project Plan (QAPP). No excursions were required from the method Standard Operating Procedure.

The quality control measures which did not meet Laboratory/QAPP criteria are annotated in the title of each affected subsection with *"Laboratory/QAPP Criteria Could Not be Met"*.

For those tests for which the EPA Region 10 Laboratory has been accredited by the National Environmental Laboratory Accreditation Conference (NELAC), all requirements of the current NELAC Standard have been met.

2. Sample Transport and Receipt

Upon sample receipt, no conditions were noted that would impact data quality.

3. Sample Holding Times

The concentration of an analyte in a sample or extract of a sample may increase or decrease over time depending on the nature of the analyte. The holding time maximum criteria applied for the extraction of soil samples is 14 days from the time of collection. Extracts have a holding time maximum of 40 days from the time of preparation. All samples were extracted and analyzed within these criteria.

4. Sample Preparation

Samples were prepared according to the method.

5. Initial Calibration/Continuing Calibration Verification (CCV) - *Laboratory/QAPP Criteria Could Not be Met*

Initial calibration was performed on 04/21/10 for #2 diesel and motor oil. Percent relative standard deviations (RSDs) of the calibration factors met the criteria of ≤20% or the correlation coefficients met the criteria of ≥0.99.

The CCV for effluent samples met the criteria for frequency of analysis and relative retention time (RRT) windows. The percent accuracies met the criteria of 85-115% except for a CCV analyzed on 05/20/10. The TPH-GC/Diesel Range Organics resulted with <85% accuracy for this CCV. The associated analyses were for sample 10194002 and 10194002 duplicate. The associated results were non-detected and were qualified UJ.

6. LCS/LCSD

Data for laboratory control sample/laboratory control sample duplicates (LCS/LCSD) are generated to provide information on the accuracy and precision of the analytical method and the laboratory performance. The LCS/LCSD recoveries were within the criteria of 50-150% with a relative percent difference (RPD) of ≤50.

7. Blank Analysis

Method blanks were prepared and analyzed with each sample extraction batch to evaluate the potential for laboratory contamination and effects on the sample results. Target analytes were not detected in the blanks.

8. Surrogate Spikes

Surrogate recoveries are used to help in the evaluation of laboratory performance on individual samples. The surrogate recoveries met the criteria of 50-150%. Recoveries for sample 10194003 and duplicate were not measurable due to the concentrations of TPHs that required high extract dilution factors.

9. Duplicate Sample Analysis

Duplicate sample analyses are performed to provide information on the precision, in the matrix of interest, of the analytical method. Duplicate analyses were performed using samples 10194002 and 10194003. All results which were above 5 times the reporting limit met the relative percent difference (RPD) criteria of ≤20.

10. Compound Identification/Quantitation

Chromatograms were reviewed with identifications of the TPH fractions judged acceptable. The initial calibration functions were used for calculations. Reported quantitation limits were based on the initial calibration standards, sample size and extract volumes used for the analysis.

All manual integrations have been reviewed and found to comply with acceptable integration practices.

11. Data Qualifiers

All requirements for data qualifiers from the preceding sections were accumulated. Each sample data summary sheet and each compound was checked for positive or negative results. From this, the overall need for data qualifiers for each analysis was determined. In cases where more than one of the preceding sections required data qualifiers, the most restrictive qualifier has been added to the data.

The usefulness of qualified data should be treated according to the severity of the qualifier in light of the project's data quality objectives. Should questions arise regarding the data, contact Gerald Dodo at the Region 10 Laboratory, phone number (360) 871 - 8728.

Qualifier	Definition
U	The analyte was not detected at or above the reported value.
J	The identification of the analyte is acceptable; the reported value is an estimate.
UJ	The analyte was not detected at or above the reported value. The reported value is an estimate.
R	The presence or absence of the analyte can not be determined from the data due to severe quality control problems. The data are rejected and considered unusable. No value is reported with this qualification.
NA	Not Applicable, the parameter was not analyzed for, or there is no analytical result for this parameter. No value is reported with this qualification.

Manchester Environmental Laboratory
Report by Parameter for Project ESD-202A

Project Code:	ESD-202A	**Collected:**	5/11/10	**11:45:00**
Project Name:	SEATTLE IRON & METAL CORP.	**Matrix:**	Solid	
Project Officer:	JON KLEMESRUD	**Sample Number:**	10194000	
Account Code:	1011B10P501E50C	**Type:**	Reg sample	
Station Description:	MAIN OFFICE ROOF RD#1 SEATTLE IRON METAL			

ORG

Parameter : Tot Petroleum Hyd, Diesel extended — Container ID : N1
Method : NWTPH-DX Diesel range organics — Analysis Date : 5/19/2010
Prep Method : 3550-M (MOD) Ultrasonic Extraction — Prep Date : 5/13/2010

			Result	Units	Qlfr
Analytes(s):	*400009	TPH-GC/Diesel Range Organics	44	mg/kg	U
	***400010**	**TPH-GC/Motor Oil Range Organic s**	**740**	**mg/kg**	
Surrogate(s :	629992	Pentacosane	115	%Rec	

Manchester Environmental Laboratory
Report by Parameter for Project ESD-202A

Project Code:	ESD-202A	**Collected:**	5/11/10	**12:20:00**
Project Name:	SEATTLE IRON & METAL CORP.	**Matrix:**	Solid	
Project Officer:	JON KLEMESRUD	**Sample Number:**	10194001	
Account Code:	1011B10P501E50C	**Type:**	Reg sample	
Station Description:	MAINTENANCE ROOF GUTTER RD#2			

			Result	Units	Qlfr
ORG					
Parameter	: Tot Petroleum Hyd, Diesel extended				Container ID : N1
Method	: NWTPH-DX	Diesel range organics			Analysis Date : 5/19/2010
Prep Method	: 3550-M	(MOD) Ultrasonic Extraction			Prep Date : 5/13/2010
Analytes(s):	*400009	TPH-GC/Diesel Range Organics	29	mg/kg	U
	***400010**	**TPH-GC/Motor Oil Range Organic s**	**380**	**mg/kg**	
Surrogate(s :	629992	Pentacosane	106	%Rec	

Manchester Environmental Laboratory
Report by Parameter for Project ESD-202A

Project Code:	ESD-202A	**Collected:**	5/11/10	**12:55:00**
Project Name:	SEATTLE IRON & METAL CORP.	**Matrix:**	Solid	
Project Officer:	JON KLEMESRUD	**Sample Number:**	10194002	
Account Code:	1011B10P501E50C	**Type:**	Reg sample	
Station Description:	EMPLOYEE PARKING LOT CATCH BASIN CBPL			

			Result	Units	Qlfr
ORG					
Parameter	: Tot Petroleum Hyd, Diesel extended				Container ID : N1
Method	: NWTPH-DX	Diesel range organics			Analysis Date : 5/20/2010
Prep Method	: 3550-M	(MOD) Ultrasonic Extraction			Prep Date : 5/13/2010
Analytes(s):	*400009	TPH-GC/Diesel Range Organics	200	mg/kg	UJ
	***400010**	**TPH-GC/Motor Oil Range Organic s**	**2500**	**mg/kg**	
Surrogate(s :	629992	Pentacosane	109	%Rec	

Manchester Environmental Laboratory
Report by Parameter for Project ESD-202A

Project Code:	ESD-202A	**Collected:**	
Project Name:	SEATTLE IRON & METAL CORP.	**Matrix:**	Solid
Project Officer:	JON KLEMESRUD	**Sample Number:**	10194002
Account Code:	1011B10P501E50C	**Type:**	Duplicate
Station Description:			

		Result	Units	Qlfr
ORG				
Parameter : Tot Petroleum Hyd, Diesel extended				Container ID : N1
Method : NWTPH-DX	Diesel range organics			Analysis Date : 5/20/2010
Prep Method : 3550-M	(MOD) Ultrasonic Extraction			Prep Date : 5/13/2010
Analytes(s): *400009	TPH-GC/Diesel Range Organics	200	mg/kg	UJ
***400010**	**TPH-GC/Motor Oil Range Organic s**	**2500**	**mg/kg**	
Surrogate(s : 629992	Pentacosane	105	%Rec	

Manchester Environmental Laboratory
Report by Parameter for Project ESD-202A

Project Code:	ESD-202A	**Collected:**	5/11/10	**13:20:00**
Project Name:	SEATTLE IRON & METAL CORP.	**Matrix:**	Solid	
Project Officer:	JON KLEMESRUD	**Sample Number:**	10194003	
Account Code:	1011B10P501E50C	**Type:**	Reg sample	
Station Description:	CATCH BASIN MYRTLE ST NW OF MAIN OFFICE			

			Result	Units	Qlfr
ORG					
Parameter	: Tot Petroleum Hyd, Diesel extended				Container ID : N1
Method	: NWTPH-DX	Diesel range organics			Analysis Date : 5/19/2010
Prep Method	: 3550-M	(MOD) Ultrasonic Extraction			Prep Date : 5/13/2010
Analytes(s):	629992	Pentacosane			NA
	***400009**	**TPH-GC/Diesel Range Organics**	**1600**	**mg/kg**	
	***400010**	**TPH-GC/Motor Oil Range Organic s**	**5300**	**mg/kg**	

Manchester Environmental Laboratory
Report by Parameter for Project ESD-202A

Project Code:	ESD-202A	**Collected:**	
Project Name:	SEATTLE IRON & METAL CORP.	**Matrix:**	Solid
Project Officer:	JON KLEMESRUD	**Sample Number:**	10194003
Account Code:	1011B10P501E50C	**Type:**	Duplicate
Station Description:			

		Result	Units	Qlfr
ORG				
Parameter	: Tot Petroleum Hyd, Diesel extended			Container ID : N1
Method	: NWTPH-DX Diesel range organics			Analysis Date : 5/21/2010
Prep Method	: 3550-M (MOD) Ultrasonic Extraction			Prep Date : 5/13/2010
Analytes(s):	629992 Pentacosane			NA
	***400009 TPH-GC/Diesel Range Organics**	**1600**	**mg/kg**	
	***400010 TPH-GC/Motor Oil Range Organic s**	**5600**	**mg/kg**	

Manchester Environmental Laboratory
Report by Parameter for Project ESD-202A

Project Code:	ESD-202A	**Collected:**	
Project Name:	SEATTLE IRON & METAL CORP.	**Matrix:**	Solid
Project Officer:	JON KLEMESRUD	**Sample Number:**	OBS0133B1
Account Code:	1011B10P501E50C	**Type:**	Blank
Station Description:			

			Result	Units	Qlfr
ORG					
Parameter	: Tot Petroleum Hyd, Diesel extended				Container ID : 0
Method	: NWTPH-DX	Diesel range organics			Analysis Date : 5/19/2010
Prep Method	: 3550-M	(MOD) Ultrasonic Extraction			Prep Date : 5/13/2010
Analytes(s):	*400009	TPH-GC/Diesel Range Organics	20	mg/kg	U
	*400010	TPH-GC/Motor Oil Range Organic s	40	mg/kg	U
Surrogate(s :	629992	Pentacosane	102	%Rec	

Manchester Environmental Laboratory
Report by Parameter for Project ESD-202A

Project Code:	ESD-202A	**Collected:**	
Project Name:	SEATTLE IRON & METAL CORP.	**Matrix:**	Solid
Project Officer:	JON KLEMESRUD	**Sample Number:**	OBS0133F1
Account Code:	1011B10P501E50C	**Type:**	LCS
Station Description:			

		Result	Units	Qlfr
ORG				
Parameter : Tot Petroleum Hyd, Diesel extended				Container ID : 0
Method : NWTPH-DX	Diesel range organics			Analysis Date : 5/19/2010
Prep Method : 3550-M	(MOD) Ultrasonic Extraction			Prep Date : 5/13/2010
Surrogate(s : 629992	Pentacosane	100	%Rec	
*400009	TPH-GC/Diesel Range Organics	89	%Rec	

Manchester Environmental Laboratory
Report by Parameter for Project ESD-202A

Project Code:	ESD-202A	**Collected:**	
Project Name:	SEATTLE IRON & METAL CORP.	**Matrix:**	Solid
Project Officer:	JON KLEMESRUD	**Sample Number:**	OBS0133F2
Account Code:	1011B10P501E50C	**Type:**	LCS
Station Description:			

		Result	Units	Qlfr
ORG				
Parameter	: Tot Petroleum Hyd, Diesel extended			Container ID : 0
Method	: NWTPH-DX Diesel range organics			Analysis Date : 5/19/2010
Prep Method	: 3550-M (MOD) Ultrasonic Extraction			Prep Date : 5/13/2010
Surrogate(s :	629992 Pentacosane	101	%Rec	
	*400009 TPH-GC/Diesel Range Organics	90	%Rec	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10 LABORATORY
7411 Beach Dr. East
Port Orchard, Washington 98366

QUALITY ASSURANCE MEMORANDUM FOR ORGANIC CHEMICAL ANALYSES

Date: June 9, 2010

To: Jon Kemesrud, Project Manager
Office of Compliance and Enforcement, USEPA Region 10

From: Steven Reimer, Chemist
Office of Environmental Assessment, USEPA Region 10 Laboratory

Subject: Quality Assurance Review for the PCB Aroclor Analysis of Samples from Seattle Iron and Metals

Project Code: ESD-202A
Account Code: 20102011B10P501E50C

cc: Dave Terpening, Office of Compliance and Enforcement, USEPA Region 10

The following is a quality assurance review of the data for PCB Aroclor analysis samples from the above referenced site. The analyses were performed by EPA Region 10 Laboratory Chemists following US EPA Laboratory guidelines.

This review was conducted for the following samples:

10194000 10194001 10194002 10194003

1. Data Qualifications

Comments below refer to the quality control specifications outlined in the Laboratory's current Quality Assurance Manual, Standard Operating Procedures (SOPs) and the Quality Assurance Project Plan (QAPP). No excursions were required from the method Standard Operating Procedure.

All measures of quality control met Laboratory/QAPP criteria.

For those tests for which the EPA Region 10 Laboratory has been accredited by the National Environmental Laboratory Accreditation Conference (NELAC), all requirements of the current NELAC Standard have been met.

2. Sample Holding Times

Upon sample receipt, no conditions were noted that would affect data quality.

3. Sample Holding Times

The concentration of an analyte in a sample or extract of a sample may increase or decrease over time depending on the nature of the analyte. For this reason, holding time limits are recommended for samples and extracts. Extracts were analyzed within 40 days of preparation. No qualifiers were applied based on holding times.

4. Sample Preparation

Samples were prepared according to the method.

5. Initial Calibration/Continuing Calibration Verification (CCV)

Initial calibrations were performed on 05/18/10 and 05/27/10. Calibration curves met the coefficient of determination criteria.

The CCV for reported samples met the criteria for frequency of analysis and relative retention time (RRT) windows. The percent accuracies met the criteria of 80-120% of the true value.

6. Laboratory Control Samples/Laboratory Control Sample Duplicates (LCS/LCSD)

LCS/LCSD are generated to provide information on the accuracy and precision of the analytical method and the laboratory performance. The LCS/LCSD recoveries were within the criteria of 70-130% with a relative percent difference ≤50%.

7. Blank Analysis

Method blanks were analyzed with each sample batch to evaluate the potential for laboratory contamination and effects on the sample results. Target analytes were not detected in method blanks.

8. Surrogate Spikes

Surrogate recoveries are used to help in the evaluation of laboratory performance on individual samples. The surrogate compound used for these analyses was decachlorobiphenyl. All surrogate recoveries were within the criteria of 50-150%.

9. Matrix Spike/Matrix Spike Duplicate Analysis (MS/MSD)

MS/MSD analyses are performed to provide information on the effects of sample matrices toward the analytical method. An MS/MSD analysis was performed using samples 10194400 (S1/S2). The MS/MSD recoveries were within the criteria of 30-150% with a relative percent difference ≤50%.

10. Compound Quantitation

The initial calibration functions were used for calculations. Reported quantitation limits were based on the initial calibration standards and sample size used for the analysis.

Sample 10194402 was prepared and analyzed in duplicate. The duplicate results rpd was ≤50%.

All manual integrations have been reviewed and found to comply with acceptable integration practices.

11. Identification

PCBs and the surrogate were identified based on chromatographic retention times of two dissimilar gas chromatography columns as determined from the initial calibration.

12. Data Qualifiers

All requirements for data qualifiers from the preceding sections were accumulated. Each sample data summary sheet and each compound was checked for positive or negative results. From this, the overall need for data qualifiers for each analysis was determined. In cases where more than one of the preceding sections required data qualifiers, the most restrictive qualifier has been added to the data.

The usefulness of qualified data should be treated according to the severity of the qualifier in light of the project's data quality objectives. Should questions arise regarding the data, contact Steve Reimer at the Region 10 Laboratory, phone number (360) 871 - 8718.

Qualifier	Definition
U	The analyte was not detected at or above the reported value.
J	The identification of the analyte is acceptable; the reported value is an estimate.

Manchester Environmental Laboratory
Report by Parameter for Project ESD-202A

Project Code:	ESD-202A	**Collected:**	5/11/10	**11:45:00**
Project Name:	SEATTLE IRON & METAL CORP.	**Matrix:**	Solid	
Project Officer:	JON KLEMESRUD	**Sample Number:**	10194000	
Account Code:	1011B10P501E50C	**Type:**	Reg sample	
Station Description:	MAIN OFFICE ROOF RD#1 SEATTLE IRON METAL			

ORG

Parameter : Polychlorinated Biphenyl — Container ID : N1
Method : 8082 Polychlorinated Biphenyls (PCBs/congeners) by GC — Analysis Date : 5/27/2010
Prep Method : 3570 SW-846 Method 3570 Micro-extraction — Prep Date : 5/26/2010

			Result	Units	Qlfr
Analytes(s):	12674112	PCB-1016	110	ug/kg	U
	11104282	PCB-1221	110	ug/kg	U
	11141165	PCB-1232	210	ug/kg	U
	53469219	PCB-1242	110	ug/kg	U
	12672296	PCB-1248	110	ug/kg	U
	11097691	**PCB-1254**	**2200**	**ug/kg**	
	11096825	PCB-1260	110	ug/kg	U
Surrogate(s :	*2051243	Decachlorobiphenyl	108	%Rec	

Manchester Environmental Laboratory
Report by Parameter for Project ESD-202A

Project Code:	ESD-202A	**Collected:**	
Project Name:	SEATTLE IRON & METAL CORP.	**Matrix:**	Solid
Project Officer:	JON KLEMESRUD	**Sample Number:**	10194000
Account Code:	1011B10P501E50C	**Type:**	Matrix Spike
Station Description:			

			Result	Units	Qlfr
ORG					
Parameter	: Polychlorinated Biphenyl				Container ID : 0
Method	: 8082	Polychlorinated Biphenyls (PCBs/congeners) by GC			Analysis Date : 5/28/2010
Prep Method	: 3570	SW-846 Method 3570 Micro-extraction			Prep Date : 5/26/2010
Surrogate(s)	*2051243	Decachlorobiphenyl	118	%Rec	
	11097691	PCB-1254	96	%Rec	

Manchester Environmental Laboratory
Report by Parameter for Project ESD-202A

Project Code:	ESD-202A	**Collected:**	
Project Name:	SEATTLE IRON & METAL CORP.	**Matrix:**	Solid
Project Officer:	JON KLEMESRUD	**Sample Number:**	10194000
Account Code:	1011B10P501E50C	**Type:**	Matrix Spike Dupl
Station Description:			

	Result	Units	Qlfr

ORG

Parameter : Polychlorinated Biphenyl — Container ID : 0
Method : 8082 Polychlorinated Biphenyls (PCBs/congeners) by GC — Analysis Date : 5/28/2010
Prep Method : 3570 SW-846 Method 3570 Micro-extraction — Prep Date : 5/26/2010

Surrogate(s :	*2051243	Decachlorobiphenyl	110	%Rec
	11097691	PCB-1254	87	%Rec

Manchester Environmental Laboratory
Report by Parameter for Project ESD-202A

Project Code:	ESD-202A	**Collected:**	5/11/10	**12:20:00**
Project Name:	SEATTLE IRON & METAL CORP.	**Matrix:**	Solid	
Project Officer:	JON KLEMESRUD	**Sample Number:**	10194001	
Account Code:	1011B10P501E50C	**Type:**	Reg sample	
Station Description:	MAINTENANCE ROOF GUTTER RD#2			

			Result	Units	Qlfr
ORG					
Parameter	: Polychlorinated Biphenyl				Container ID : N1
Method	: 8082	Polychlorinated Biphenyls (PCBs/congeners) by GC			Analysis Date : 5/27/2010
Prep Method	: 3570	SW-846 Method 3570 Micro-extraction			Prep Date : 5/26/2010
Analytes(s):	12674112	PCB-1016	200	ug/kg	U
	11104282	PCB-1221	200	ug/kg	U
	11141165	PCB-1232	400	ug/kg	U
	53469219	PCB-1242	200	ug/kg	U
	12672296	PCB-1248	200	ug/kg	U
	11097691	**PCB-1254**	**2300**	**ug/kg**	
	11096825	PCB-1260	200	ug/kg	U
Surrogate(s :	*2051243	Decachlorobiphenyl	103	%Rec	

Manchester Environmental Laboratory
Report by Parameter for Project ESD-202A

Project Code:	ESD-202A	**Collected:**	5/11/10	**12:55:00**
Project Name:	SEATTLE IRON & METAL CORP.	**Matrix:**	Solid	
Project Officer:	JON KLEMESRUD	**Sample Number:**	10194002	
Account Code:	1011B10P501E50C	**Type:**	Reg sample	
Station Description:	EMPLOYEE PARKING LOT CATCH BASIN CBPL			

ORG

Parameter : Polychlorinated Biphenyl — Container ID : N1
Method : 8082 Polychlorinated Biphenyls (PCBs/congeners) by GC — Analysis Date : 5/27/2010
Prep Method : 3570 SW-846 Method 3570 Micro-extraction — Prep Date : 5/26/2010

			Result	Units	Qlfr
Analytes(s):	12674112	PCB-1016	250	ug/kg	U
	11104282	PCB-1221	250	ug/kg	U
	11141165	PCB-1232	500	ug/kg	U
	53469219	PCB-1242	250	ug/kg	U
	12672296	PCB-1248	250	ug/kg	U
	11097691	**PCB-1254**	**4200**	**ug/kg**	
	11096825	PCB-1260	250	ug/kg	U
Surrogate(s :	*2051243	Decachlorobiphenyl	86	%Rec	

Report by Parameter for Project ESD-202A

Project Code: ESD-202A
Project Name: SEATTLE IRON & METAL CORP.
Project Officer: JON KLEMESRUD
Account Code: 1011B10P501E50C
Station Description:

Collected:
Matrix: Solid
Sample Number: 10194002
Type: Duplicate

ORG

Parameter : Polychlorinated Biphenyl — Container ID : N1
Method : 8082 Polychlorinated Biphenyls (PCBs/congeners) by GC — Analysis Date : 5/27/2010
Prep Method : 3570 SW-846 Method 3570 Micro-extraction — Prep Date : 5/26/2010

			Result	Units	Qlfr
Analytes(s):	12674112	PCB-1016	250	ug/kg	U
	11104282	PCB-1221	250	ug/kg	U
	11141165	PCB-1232	500	ug/kg	U
	53469219	PCB-1242	250	ug/kg	U
	12672296	PCB-1248	250	ug/kg	U
	11097691	**PCB-1254**	**4900**	**ug/kg**	
	11096825	PCB-1260	250	ug/kg	U
Surrogate(s :	*2051243	Decachlorobiphenyl	102	%Rec	

Manchester Environmental Laboratory
Report by Parameter for Project ESD-202A

Project Code:	ESD-202A	**Collected:**	5/11/10	**13:20:00**
Project Name:	SEATTLE IRON & METAL CORP.	**Matrix:**	Solid	
Project Officer:	JON KLEMESRUD	**Sample Number:**	10194003	
Account Code:	1011B10P501E50C	**Type:**	Reg sample	
Station Description:	CATCH BASIN MYRTLE ST NW OF MAIN OFFICE			

ORG

Parameter : Polychlorinated Biphenyl — Container ID : N1
Method : 8082 Polychlorinated Biphenyls (PCBs/congeners) by GC — Analysis Date : 5/27/2010
Prep Method : 3570 SW-846 Method 3570 Micro-extraction — Prep Date : 5/26/2010

			Result	Units	Qlfr
Analytes(s):	12674112	PCB-1016	250	ug/kg	U
	11104282	PCB-1221	250	ug/kg	U
	11141165	PCB-1232	500	ug/kg	U
	53469219	**PCB-1242**	**5900**	**ug/kg**	
	12672296	PCB-1248	250	ug/kg	U
	11097691	**PCB-1254**	**3600**	**ug/kg**	
	11096825	PCB-1260	250	ug/kg	U
Surrogate(s :	*2051243	Decachlorobiphenyl	90	%Rec	

Manchester Environmental Laboratory
Report by Parameter for Project ESD-202A

Project Code:	ESD-202A	**Collected:**	
Project Name:	SEATTLE IRON & METAL CORP.	**Matrix:**	Solid
Project Officer:	JON KLEMESRUD	**Sample Number:**	OBS0146B1
Account Code:	1011B10P501E50C	**Type:**	Blank
Station Description:			

ORG

Parameter : Polychlorinated Biphenyl — Container ID : 0
Method : 8082 Polychlorinated Biphenyls (PCBs/congeners) by GC — Analysis Date : 5/27/2010
Prep Method : 3570 SW-846 Method 3570 Micro-extraction — Prep Date : 5/26/2010

			Result	Units	Qlfr
Analytes(s):	12674112	PCB-1016	50	ug/kg	U
	11104282	PCB-1221	50	ug/kg	U
	11141165	PCB-1232	100	ug/kg	U
	53469219	PCB-1242	50	ug/kg	U
	12672296	PCB-1248	50	ug/kg	U
	11097691	PCB-1254	50	ug/kg	U
	11096825	PCB-1260	50	ug/kg	U
Surrogate(s :	*2051243	Decachlorobiphenyl	110	%Rec	

Manchester Environmental Laboratory
Report by Parameter for Project ESD-202A

Project Code:	ESD-202A	**Collected:**	
Project Name:	SEATTLE IRON & METAL CORP.	**Matrix:**	Solid
Project Officer:	JON KLEMESRUD	**Sample Number:**	OBS0146F1
Account Code:	1011B10P501E50C	**Type:**	LCS
Station Description:			

		Result	Units	Qlfr

ORG

Parameter : Polychlorinated Biphenyl — Container ID : 0
Method : 8082 Polychlorinated Biphenyls (PCBs/congeners) by GC — Analysis Date : 5/27/2010
Prep Method : 3570 SW-846 Method 3570 Micro-extraction — Prep Date : 5/26/2010

Surrogate(s :	*2051243	Decachlorobiphenyl	119	%Rec
	11097691	PCB-1254	111	%Rec

Report by Parameter for Project ESD-202A

Project Code:	ESD-202A	**Collected:**	
Project Name:	SEATTLE IRON & METAL CORP.	**Matrix:**	Solid
Project Officer:	JON KLEMESRUD	**Sample Number:**	OBS0146F2
Account Code:	1011B10P501E50C	**Type:**	LCSD
Station Description:			

		Result	Units	Qlfr
ORG				
Parameter	: Polychlorinated Biphenyl			Container ID : 0
Method	: 8082 Polychlorinated Biphenyls (PCBs/congeners) by GC			Analysis Date : 5/27/2010
Prep Method	: 3570 SW-846 Method 3570 Micro-extraction			Prep Date : 5/26/2010
Surrogate(s)	*2051243 Decachlorobiphenyl	110	%Rec	
	11097691 PCB-1254	110	%Rec	

Manchester Environmental Laboratory
Report by Parameter for Project ESD-202A

Project Code:	ESD-202A	**Collected:**	
Project Name:	SEATTLE IRON & METAL CORP.	**Matrix:**	Solid
Project Officer:	JON KLEMESRUD	**Sample Number:**	OBS0146F3
Account Code:	1011B10P501E50C	**Type:**	LCS
Station Description:			

	Result	Units	Qlfr

ORG

Parameter : Polychlorinated Biphenyl — Container ID : 0
Method : 8082 Polychlorinated Biphenyls (PCBs/congeners) by GC — Analysis Date : 5/27/2010
Prep Method : 3570 SW-846 Method 3570 Micro-extraction — Prep Date : 5/26/2010

Surrogate(s :	*2051243	Decachlorobiphenyl	103	%Rec
	53469219	PCB-1242	94	%Rec

Manchester Environmental Laboratory
Report by Parameter for Project ESD-202A

Project Code:	ESD-202A	**Collected:**	
Project Name:	SEATTLE IRON & METAL CORP.	**Matrix:**	Solid
Project Officer:	JON KLEMESRUD	**Sample Number:**	OBS0146F4
Account Code:	1011B10P501E50C	**Type:**	LCSD
Station Description:			

		Result	Units	Qlfr
ORG				
Parameter : Polychlorinated Biphenyl				Container ID : 0
Method : 8082	Polychlorinated Biphenyls (PCBs/congeners) by GC			Analysis Date : 5/27/2010
Prep Method : 3570	SW-846 Method 3570 Micro-extraction			Prep Date : 5/26/2010
Surrogate(s : *2051243	Decachlorobiphenyl	114	%Rec	
53469219	PCB-1242	103	%Rec	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10 LABORATORY
7411 Beach Dr. East
Port Orchard, Washington 98366

QUALITY ASSURANCE MEMORANDUM FOR INORGANIC CHEMICAL ANALYSES

DATE: August 23, 2010

TO: Jon Klemesrud, Project Manager
Office of Compliance and Enforcement, US EPA Region 10 Laboratory

FROM: Melissa Billings, Chemist
Office of Environmental Assessment, US EPA Region 10 Laboratory

SUBJECT: Quality Assurance Review of Seattle Iron and Metal Samples
For Total Organic Carbon

Project Code: ESD-202A
Account Code: 1011B10P501E50C

CC: Dave Terpening
Office of Environmental Assessment, US EPA Region 10 Laboratory

The following is a quality assurance review of the results of the analysis of four soil samples for Total Organic Carbon (TOC). This sample was submitted for the Seattle Iron and Metal Corp. Project. The analysis was performed by EPA chemists at the US EPA Region 10 Laboratory in Port Orchard, WA, following US EPA and Laboratory guidelines.

This review was conducted for the following samples:

10194000 10194001 10194002 10194003

Data Qualifications

Comments below refer to the quality control specifications outlined in the Laboratory's current Quality Assurance Manual, Standard Operating Procedures (SOPs) and the Quality Assurance Project Plan (QAPP). No excursions were required from the method Standard Operating Procedure.

All measures of quality control met Laboratory/QAPP criteria.

For those tests for which the USEPA Region 10 Laboratory has been accredited by the National Environmental Laboratory Accreditation Conference (NELAC), all requirements of the current NELAC Standard have been met.

1. Sample Transport and Receipt

Upon sample receipt, all conditions met Laboratory/QAPP requirements for this project.

2. Sample Holding Times

The concentration of an analyte in a sample or sample extract may increase or decrease over time depending on the nature of the analyte. For this reason, holding time limits are recommended for samples. The holding time for TOC in soils which have been frozen is 6 months. There is no guidance for the holding time for TOC in soils which have been stored at <6°C, as these samples were stored. The samples were analyzed 42 days after collection. In the reviewer's opinion, the results do not require qualification on the basis on holding times.

3. Sample Preparation

Samples were prepared according to the method outlined in the SOP for these analytes for this type of matrix. No qualification of the data was required based on sample preparation.

4. Initial Calibration and Calibration Verification

The linear regression generated for the initial calibrations met method criteria. The low point of the calibration curve is usually the Minimum Reporting Level (MRL) of the method. All calibration verification checks met the frequency and recovery criteria on the day of analysis. No qualification was required based on calibration or calibration verification.

5. Laboratory Control Samples

All laboratory control sample results met the recovery acceptance criteria for the methods reported. No qualification was required based on laboratory control sample analysis.

6. Blank Analysis

The method blanks did not contain detectable levels of Total Organic Carbon which would require data qualification.

7. Duplicate Analysis

Duplicate analysis was performed on sample 10194000. Sample results were within the +/- 20% RPD requirement. No qualification was required based on duplicate analysis.

8. Matrix Spike/Matrix Spike Duplicate Analysis

Matrix Spike/Matrix Spike Duplicate analysis was performed on sample 10194000. All results met the 75-125% matrix spike recovery criterion. No qualification was required based on matrix spike analyses.

9. Reference Materials

A reference material was prepared and analyzed with these samples. Analytical values for this sample were within the range of acceptable results. No qualification was necessary based on analysis of the reference material.

10. Reporting Limits

All sample results that fall below the MRL are assigned the value of the MRL and the 'U' qualifier is attached.

11. Data Qualifiers

No data qualification was required for this analysis.

Below are the definitions for the codes used for qualifying data from these analyses. When more than one quality issue was involved, the most restrictive qualifier has been attached to the data.

U - The analyte was not detected at or above the reported value.

The usefulness of qualified data should be treated according to the severity of the qualifier in light of the project's data quality objectives. Should questions arise regarding the data, contact Katie Adams at the Region 10 Laboratory, phone number (360) 871- 8748.

12. Definitions

Accuracy - the degree of conformity of a measured or calculated quantity to its actual value.

Duplicate Analysis – when a duplicate of a sample (DS), a matrix spike (MSD), or a laboratory control sample (LCSD) is analyzed, it is possible to use the comparison of the results in terms of relative percent difference (RPD) to calculate precision.

Laboratory Control Sample (LCS) - a clean matrix spiked with known quantities of analytes. The LCS is processed with samples through every step of preparation and analysis. Measuring percent recovery of each analyte in the LCS provides a measurement of accuracy for the analyte in the project samples. A laboratory control sample is prepared and analyzed at a frequency no less than one for every 20 project samples.

Matrix Spike/Matrix Spike Duplicate (MS/MSD) - Sample analyses performed to provide information about the effect of the sample matrix on analyte recovery and measurement within the project samples. To create the MS/MSD, a project sample is spiked with known quantities of analytes and the percent recoveries of the analytes are determined.

Method Blank- An analytical control that is carried through the entire analytical procedure. The method blank is used to define the level of laboratory background and reagent contamination. A method blank is prepared and analyzed for every batch of samples at a minimum frequency of one per every 20 samples. To produce unqualified data, the result of the method blank analysis is required to be less than the MRL and less than 10 times the amount of analyte found in any project sample.

Minimum Reporting Level (MRL) - the smallest measured concentration of a substance that can be reliably measured using a given analytical method.

Precision – the degree of mutual agreement or repeatability among a series of individual results.

Reference materials – Samples with analyte values that are homogeneous and well established. This allows the reference material to be used to assess the accuracy of the measurement method.

Relative Percent Difference – The difference between two sample results divided by their mean and expressed as a percentage.

Manchester Environmental Laboratory
Report by Parameter for Project ESD-202A

Project Code:	ESD-202A	**Collected:**	5/11/10	**11:45:00**
Project Name:	SEATTLE IRON & METAL CORP.	**Matrix:**	Solid	
Project Officer:	JON KLEMESRUD	**Sample Number:**	10194000	
Account Code:	1011B10P501E50C	**Type:**	Reg sample	
Station Description:	MAIN OFFICE ROOF RD#1 SEATTLE IRON METAL			

		Result	Units	Qlfr

GEN

Parameter : Total Organic Carbon — Container ID : N1
Method : PSEP Puget Sound Estuary Program — Analysis Date : 6/22/2010
Prep Method : PSEP Puget Sound Estuary Program — Prep Date : 6/22/2010

Analytes(s):	***90064**	**Total Organic Carbon**	**100000**	**mg/kg-dry**

Manchester Environmental Laboratory
Report by Parameter for Project ESD-202A

Project Code:	ESD-202A	**Collected:**	
Project Name:	SEATTLE IRON & METAL CORP.	**Matrix:**	Solid
Project Officer:	JON KLEMESRUD	**Sample Number:**	10194000
Account Code:	1011B10P501E50C	**Type:**	Duplicate
Station Description:			

		Result	Units	Qlfr

GEN

Parameter : Total Organic Carbon — Container ID : N1
Method : PSEP Puget Sound Estuary Program — Analysis Date : 6/22/2010
Prep Method : PSEP Puget Sound Estuary Program — Prep Date : 6/22/2010

Analytes(s):	***90064**	**Total Organic Carbon**	**102000**	**mg/kg-dry**

Manchester Environmental Laboratory
Report by Parameter for Project ESD-202A

Project Code:	ESD-202A	**Collected:**	
Project Name:	SEATTLE IRON & METAL CORP.	**Matrix:**	Solid
Project Officer:	JON KLEMESRUD	**Sample Number:**	10194000
Account Code:	1011B10P501E50C	**Type:**	Matrix Spike
Station Description:			

		Result	Units	Qlfr

GEN

Parameter : Total Organic Carbon — Container ID : N1
Method : PSEP Puget Sound Estuary Program — Analysis Date : 6/22/2010
Prep Method : PSEP Puget Sound Estuary Program — Prep Date : 6/22/2010

Surrogate(s :	*90064	Total Organic Carbon	94	%Rec

Manchester Environmental Laboratory
Report by Parameter for Project ESD-202A

Project Code:	ESD-202A	**Collected:**	
Project Name:	SEATTLE IRON & METAL CORP.	**Matrix:**	Solid
Project Officer:	JON KLEMESRUD	**Sample Number:**	10194000
Account Code:	1011B10P501E50C	**Type:**	Matrix Spike Dupl
Station Description:			

		Result	Units	Qlfr
GEN				
Parameter : Total Organic Carbon				Container ID : N1
Method : PSEP	Puget Sound Estuary Program			Analysis Date : 6/22/2010
Prep Method : PSEP	Puget Sound Estuary Program			Prep Date : 6/22/2010
Surrogate(s : *90064	Total Organic Carbon	92	%Rec	

Manchester Environmental Laboratory
Report by Parameter for Project ESD-202A

Project Code:	ESD-202A	**Collected:**	5/11/10	**12:20:00**
Project Name:	SEATTLE IRON & METAL CORP.	**Matrix:**	Solid	
Project Officer:	JON KLEMESRUD	**Sample Number:**	10194001	
Account Code:	1011B10P501E50C	**Type:**	Reg sample	
Station Description:	MAINTENANCE ROOF GUTTER RD#2			

GEN

Parameter : Total Organic Carbon — Container ID : N1
Method : PSEP Puget Sound Estuary Program — Analysis Date : 6/22/2010
Prep Method : PSEP Puget Sound Estuary Program — Prep Date : 6/22/2010

Analytes(s):		**Result**	**Units**	**Qlfr**
*90064	**Total Organic Carbon**	**75300**	**mg/kg-dry**	

Manchester Environmental Laboratory
Report by Parameter for Project ESD-202A

Project Code:	ESD-202A	**Collected:**	5/11/10	**12:55:00**
Project Name:	SEATTLE IRON & METAL CORP.	**Matrix:**	Solid	
Project Officer:	JON KLEMESRUD	**Sample Number:**	10194002	
Account Code:	1011B10P501E50C	**Type:**	Reg sample	
Station Description:	EMPLOYEE PARKING LOT CATCH BASIN CBPL			

		Result	Units	Qlfr

GEN

Parameter : Total Organic Carbon — Container ID : N1
Method : PSEP Puget Sound Estuary Program — Analysis Date : 6/22/2010
Prep Method : PSEP Puget Sound Estuary Program — Prep Date : 6/22/2010

Analytes(s):	***90064**	**Total Organic Carbon**	**81600**	**mg/kg-dry**

Manchester Environmental Laboratory
Report by Parameter for Project ESD-202A

Project Code:	ESD-202A	**Collected:**	5/11/10	**13:20:00**
Project Name:	SEATTLE IRON & METAL CORP.	**Matrix:**	Solid	
Project Officer:	JON KLEMESRUD	**Sample Number:**	10194003	
Account Code:	1011B10P501E50C	**Type:**	Reg sample	
Station Description:	CATCH BASIN MYRTLE ST NW OF MAIN OFFICE			

		Result	Units	Qlfr

GEN

Parameter : Total Organic Carbon — Container ID : N1
Method : PSEP Puget Sound Estuary Program — Analysis Date : 6/22/2010
Prep Method : PSEP Puget Sound Estuary Program — Prep Date : 6/22/2010

Analytes(s):	***90064**	**Total Organic Carbon**	**149000**	**mg/kg-dry**

Manchester Environmental Laboratory
Report by Parameter for Project ESD-202A

Project Code:	ESD-202A	**Collected:**	
Project Name:	SEATTLE IRON & METAL CORP.	**Matrix:**	Solid
Project Officer:	JON KLEMESRUD	**Sample Number:**	IS062210A
Account Code:	1011B10P501E50C	**Type:**	Blank
Station Description:			

		Result	Units	Qlfr
GEN				
Parameter : Total Organic Carbon				Container ID :
Method : PSEP	Puget Sound Estuary Program			Analysis Date : 6/22/2010
Prep Method : PSEP	Puget Sound Estuary Program			Prep Date : 6/22/2010
Analytes(s): *90064	Total Organic Carbon	500	mg/kg-dry	U

Manchester Environmental Laboratory
Report by Parameter for Project ESD-202A

Project Code:	ESD-202A	**Collected:**	
Project Name:	SEATTLE IRON & METAL CORP.	**Matrix:**	Solid
Project Officer:	JON KLEMESRUD	**Sample Number:**	IS062210A
Account Code:	1011B10P501E50C	**Type:**	Control
Station Description:			

		Result	Units	Qlfr
GEN				
Parameter	: Total Organic Carbon			Container ID :
Method	: PSEP Puget Sound Estuary Program			Analysis Date : 6/22/2010
Prep Method	: PSEP Puget Sound Estuary Program			Prep Date : 6/22/2010
Surrogate(s : *90064	Total Organic Carbon	100	%Rec	

Manchester Environmental Laboratory
Report by Parameter for Project ESD-202A

Project Code:	ESD-202A	**Collected:**	
Project Name:	SEATTLE IRON & METAL CORP.	**Matrix:**	Solid
Project Officer:	JON KLEMESRUD	**Sample Number:**	IS062210A
Account Code:	1011B10P501E50C	**Type:**	LCS
Station Description:			

	Result	Units	Qlfr

GEN

Parameter : Total Organic Carbon — Container ID :
Method : PSEP Puget Sound Estuary Program — Analysis Date : 6/22/2010
Prep Method : PSEP Puget Sound Estuary Program — Prep Date : 6/22/2010

Surrogate(s :	*90064	Total Organic Carbon	99	%Rec

Manchester Environmental Laboratory
Report by Parameter for Project ESD-202A

Project Code:	ESD-202A	**Collected:**	
Project Name:	SEATTLE IRON & METAL CORP.	**Matrix:**	Solid
Project Officer:	JON KLEMESRUD	**Sample Number:**	IS062210A
Account Code:	1011B10P501E50C	**Type:**	LCSD
Station Description:			

	Result	Units	Qlfr

GEN

Parameter : Total Organic Carbon — Container ID :
Method : PSEP Puget Sound Estuary Program — Analysis Date : 6/22/2010
Prep Method : PSEP Puget Sound Estuary Program — Prep Date : 6/22/2010

Surrogate(s : *90064	Total Organic Carbon	100	%Rec	

Re: Seattle Boiler Works data
Christopher Hall to: Margaret Mccauley 07/26/2010 12:12 PM
Cc: Kris Flint, Jed Januch

History: This message has been replied to and forwarded.

Margaret/Kris,
The new EPA ambient air monitoring standard for Pb is 0.15 micrograms/cubic meter (ug/m3) averaged over a 3 month period (24 hour sample collection period). Converting 1100 ppm Pb to ug/m3 from the attached results equates to 130 ug/m3 (assuming most all the dust on the car is re-entrained from the area surrounding SIM and Seattle Boiler Works). So assuming a 12 hours work day we can just divide 130 ug/m3 by 2 which equates to 65 ug/m3 of re-entrained Pb in the area surrounding SIM (not good!). So even if my calculations are over-predicting by 100x it is likely that if we placed a Pb reference method monitor at this location we would see an exceedance of the EPA Pb standard. It will be interesting to see what our air sampling results show us.

Chris

Margaret Mccauley interesting. I guess this kicks off the question of... 07/22/2010 03:18:57 PM

From: Margaret Mccauley/R10/USEPA/US
To: Christopher Hall/R10/USEPA/US@EPA, Kris Flint/R10/USEPA/US@EPA
Date: 07/22/2010 03:18 PM
Subject: Fw: Seattle Boiler Works data

interesting. I guess this kicks off the question of "what to compare the samples to" in terms of determining whether they are actionable at all.

---- Forwarded by Margaret Mccauley/R10/USEPA/US on 07/22/2010 03:19 PM ----

From: "Stegman, Greg (ECY)" <GSTE461@ECY.WA.GOV>
To: Margaret Mccauley/R10/USEPA/US@EPA, "Abbasi, Ed (ECY)" <EABB461@ECY.WA.GOV>, "Shervey, Jerry (ECY)" <GSHE461@ECY.WA.GOV>, "Wright, Robert (ECY)" <ROWR461@ECY.WA.GOV>
Date: 07/22/2010 03:16 PM
Subject: Seattle Boiler Works data

Folks,

I was at Seattle Boiler Works and the owner , Craig Hopkins, gave me the attached sampling results. Mr. Hopkins for some time has been concerned that dust from Seattle Iron and Metals is being deposited on his property and vehicles. This sample consisted of dust collected from a car wind shield wiper. The car's wind shield was cleaned at the beginning of the work shift and at the end of the shift dust, which had accumulated on the wiper, was tested.

write PSCAA pitch + send to Jeff Kirkright

<<20100722141913591.pdf>> 20100722141913591.pdf

December 9, 2009

Craig Hopkins
Seattle Boiler Works, Inc.
500 S. Myrtle St.
Seattle, WA 98108

NVL LABS
HAZARDOUS MATERIALS SERVICES

RE: Metals Analysis; NVL Batch # 2914661.00

Dear Mr. Hopkins,

Enclosed please find the test results for samples submitted to our laboratory for analysis. Examination of these samples was conducted using analytical instruments in accordance to U.S. EPA, NIOSH, OSHA and other ASTM methods.

For matrix materials submitted as paint, dust wipe, soil or TCLP samples, analysis for the presence of total metals is conducted using published U.S. EPA Methods. Paint and soil results are usually expressed in mg/Kg which is equivalent to parts per million (ppm). Lead (Pb) in paint is usually expressed in mg/Kg (ppm) , Percent (%) or mg/cm^2 by area. Dust wipe sample results are usually expressed in ug/wipe and ug/ft^2. TCLP samples are reported in mg/L (ppm). For air filter samples, analyses are conducted using NIOSH and OSHA Methods. Results are expressed in ug/filter and ug/m^3. Other matrix materials are analyzed accordingly using published methods or specified by client. The reported test results pertain only to items tested. Lead test results are not blank corrected.

NVLAP # 102063

AIHA Environmental Lead and Industrial Hygiene ACCREDITED LABORATORY
AIHA - IH #101661

For recent regulation updates pertaining to current regulatory levels or permissible exposure levels, please call your local regulatory agencies for more details.

This report is considered highly confidential and will not be released without your approval. Samples are archived for two weeks following analysis. Samples that are not retrieved by the client are discarded after two weeks.

Thank you for using our laboratory services. If you need further assistance please feel free to call us at 206-547-0100 or 1-888-NVLLABS.

Sincerely,

Nick Ly, Technical Director

Enclosure:

NVL LABORATORIES, INC
4708 AURORA AVE N
SEATTLE, WA 98103.6516
TEL 206.547.0100
FAX 206.634.1936
nvllabs@nvllabs.com

www.nvllabs.com
1.888.NVL.LABS (685.5227)

NVL Laboratories, Inc.
4708 Aurora Ave. N., Seattle, WA 98103
Tel: 206.547.0100, Fax: 206.634.1936
www.nvllabs.com

Analysis Report

AIHA - IH # 101861
WA - DOE # C1765
AIHA Environmental Lead and Industrial Hygiene ACCREDITED LABORATORY

Total Metals

Client: Seattle Boiler Works, Inc.
Address: 500 S. Myrtle St.
Seattle, WA 98108

Attention: Mr. Craig Hopkins
Project Location: 500 S. Myrtle St.
Seattle, WA 98108

Batch #: 2914661.00
Matrix: Dust Debris
Method: EPA 6010
Client Project #: P.O#L1000C
Date Received: 12/08/2009
Samples Received: 1
Samples Analyzed: 1

Lab ID	Client Sample #	Elements	Sample wt (g)	RL mg / kg	Results in mg / kg	Results in ppm
29103473	1	Chromium (Cr)	0.2026	20.0	150.0	150.0
		Lead (Pb)	0.2026	20.0	1100.0	1100.0
		Copper (Cu)	0.2026	20.0	660.0	660.0
		Zinc (Zn)	0.2026	20.0	7500.0	7500.0

Sampled by: Client
Analyzed by: Brittany Vogel
Reviewed by: Nick Ly

Date Analyzed: 12/09/2009
Date Issued: 12/09/2009

Nick Ly, Technical Director

mg/ kg = Milligrams per kilogram
ppm = Parts per million

RL = Reporting Limit
'<' = Below the reporting Limit

Note : Method QC results are acceptable unless stated otherwise.
Unless otherwise indicated, the condition of all samples was acceptable at time of receipt.

Bench Run No: 29-1209-03

NVL Laboratories, Inc.
4708 Aurora Ave N, Seattle, WA 98103
Tel: 206.547.0100 Emerg. Cell: 206.914.4646
1.888.NVL.LABS (685.5227) www.nvllabs.com

CHAIN OF CUSTODY SAMPLE LOG

BATCH ID
2914661.00

Client: Seattle Boiler Works, Inc.
Address: 500 S. Myrtle St.
Seattle, WA 98108

Project Manager: Mr. Craig Hopkins
Project Location: 500 S. Myrtle St.
Seattle, WA 98108
Phone: Fax:

NVL Batch Number: 2914661.00
Client Job Number: P.O#L1000C
Total Samples: 1 Rush Samples:
TAT: 24-Hrs Rush TAT: AH: No
Due Date: 12/09/2009 Time: 1:35 PM
Email address: chopkins@seattleboiler.com

☐ Asbestos Air	☐ PCM (NIOSH 7400)	☐ TEM (NIOSH 7402)	☐ TEM (AHERA)	☐ TEM (EPA Level II)	☐ Other		
☐ Asbestos Bulk	☐ PLM (EPA/600/R-93/116)	☐ PLM (EPA Point Count)	☐ PLM (EPA Gravimetry)	☐ TEM BULK			
☐ Mold/Fungus	☐ Mold Air	☐ Mold Bulk	☐ Rotometer Calibration				

METALS	Inst/Det.Limit	Matrix		RCRA Metals		
☒ Total Metals	☐ FAA (ppm)	☐ Air Filter	☒ Paint Chips in %	☐ Arsenic (As)	☒ Lead (Pb)	☒ Copper (Cu)
☐ TCLP	☒ ICP (ppm)	☐ Drinking water	☐ Paint Chips in cn	☐ Barium (Ba)	☐ Mercury (Hg)	☐ Nickel (Ni)
☐ Cr 6	☐ GFAA (ppb)	☐ Dust/wipe (Area)	☐ Waste Water	☐ Cadmium (Cd)	☐ Selenium (Se)	☒ Zinc (Zn)
	☐ CVAA (ppb)	☐ Soil	☐ Other	☒ Chromium (Cr)	☐ Silver (Ag)	

☐ Other Types of Analysis: ☐ Fiberglass ☐ Nuisance Dust ☐ Other (Specify) ☐ Silica ☐ Respirable Dust

Condition of Package: ☒ Good ☐ Damaged (no spillage) ☐ Severe damage (spillage)

1	29103473	1		A

PAID -Y.K
VISA
12/9/09
$135.00

	Print Below	Sign Below	Company	Date	Time
Sampled by	Client				
Relinquished by	Client				
Received by	Fatima Khan		NVL	12/8/09	1335
Relinquished by					
Analyzed by	Brittany Vogel		NVL	12/9/09	12:10
Results Called by					
☐ Faxed ☒ Emailed	Brittany Vogel			12/9/09	12:20

Special Instructions: Unless requested in writing, all samples will be disposed of two (2) weeks after analysis.
email results

Received By: Fatima Khan Date: 12/8/2009 Time: 1:30 PM Page

NVL Laboratories, Inc.
4708 Aurora Ave. N., Seattle, WA 98103
Tel: 206.547.0100, Fax: 206.634.1936
www.nvllabs.com

NVLAP

For the scope of accreditation under NVLAP Lab Code 102063-0

Bulk Asbestos Fibers Analysis

By Polarized Light Microscopy

Client: Seattle Boiler Works, Inc.
Address: 500 S. Myrtle St.
Seattle, WA 98108

Attention: Mr. Craig Hopkins
Project Location: 500 S. Myrtle St.
Seattle, WA 98108

Batch #: 2914663.00
Client Project #: P.O#L1000C
Date Received: 12/08/2009
Samples Received: 1
Samples Analyzed: 1
Method: EPA/600R-93/116

Lab ID: 29103479 **Client Sample #: 1**
Location: 500 S. Myrtle St.

Layer 1 of 1 **Description:** Brown fibrous material

Non-Fibrous Materials:	Other Fibrous Materials:%	**Asbestos Type: %**
Fine particles, Sand	Cellulose 61%	**None Detected ND**
	Mineral wool 2%	
	Glass fibers 2%	

Sampled by: Client

Analyzed by: Lyudmila Veh **Date:** 12/09/2009

DRAFT

Note: If samples are not homogeneous, then subsamples of the components were analyzed separately. All bulk samples are analyzed using EPA 600/R-93/116 Method with the following measurement uncertainties for the reported % Asbestos (1%=0-3%, 5%=1-9%, 10%=5-15%, 20%=10-30%, 50%=40-60%). This report relates only to the items tested. If sample was not collected by NVL personnel, then the accuracy of the results is limited by the methodology and acuity of the sample collector. This report shall not be reproduced except in full, without written approval of NVL Laboratories, Inc. It shall not be used to claim product endorsement by NVLAP or any other agency of the US Government.

WAD231968

Re: Seattle Boiler Works data
Christopher Hall to: Margaret Mccauley 07/26/2010 12:12 PM
Cc: Kris Flint, Jed Januch

History: This message has been replied to and forwarded.

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To: Margaret Mccauley/R10/USEPA/US@EPA, "Abbasi, Ed (ECY)" <EABB461@ECY.WA.GOV>, "Shervey, Jerry (ECY)" <GSHE461@ECY.WA.GOV>, "Wright, Robert (ECY)" <ROWR461@ECY.WA.GOV>
Date: 07/22/2010 03:16 PM
Subject: Seattle Boiler Works data

Folks,

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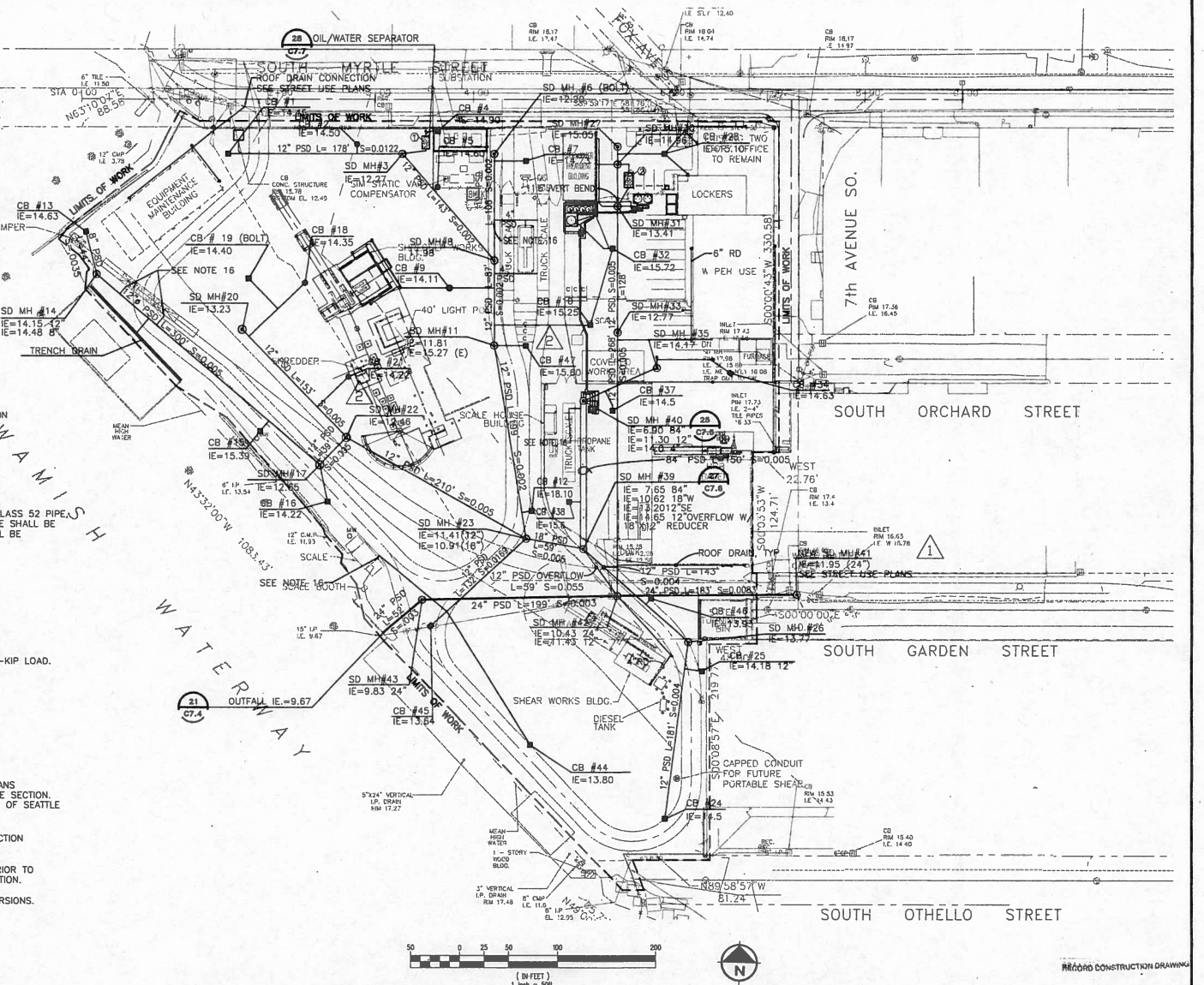
STORM DRAINAGE NOTES

THESE NOTES APPLY TO GRADING AND DRAINAGE ONLY.

1. ALL PIPE AND APPURTENANCES SHALL BE LAID ON A PROPERLY PREPARED FOUNDATION IN ACCORDANCE WITH THE CONTRACT SPECIFICATIONS. THIS SHALL INCLUDE LEVELING AND COMPACTING THE TRENCH BOTTOM, THE TOP OF THE FOUNDATION MATERIAL AND REQUIRED PIPE BEDDING, TO A UNIFORM GRADE SO THAT THE ENTIRE PIPE IS SUPPORTED BY UNIFORM DENSE UNYIELDING BASE PER (31 C7.8).
2. DATUM: HORIZONTAL – SEATTLE TIDELANDS
   VERTICAL – PORT OF SEATTLE (MLLW)
3. SERVICE DRAINS SHALL NOT BE BACKFILLED UNTIL THE PIPE HAS BEEN INSPECTED AND APPROVED BY THE ENGINEER, AND THE LOCATION AND DEPTH IS RECORDED.
4. NEW CONNECTIONS TO NEW OR EXISTING PIPES WITHOUT PREFABRICATED TEES SHALL BE CONNECTED BY CORE DRILLING AND CONNECTION. PIPE WYE CONNECTION, SHALL BE PER CITY OF SEATTLE STANDARDS.
5. ALL DOWNSPOUT, PLANTER AND AREA DRAIN LINES SHALL BE CONNECTED TO THE STORM DRAIN, AND SHALL BE SLOPED AT 2% MINIMUM WITH MINIMUM COVER OF 1.5 FEET. DRAINS CONNECTING THREE OR MORE LINES SHALL BE 6-INCH DIAMETER MINIMUM.
6. ALL CLEANOUTS SHALL BE TYPE 280 PER CITY OF SEATTLE STANDARD PLANS. REFER TO NOTE 21 OF THE GENERAL NOTES.
7. THE CONTRACTOR SHALL PROVIDE SHORING FOR PIPE EXCAVATIONS THAT COULD CAUSE DAMAGE TO EXISTING STRUCTURES OR BE HAZARDOUS TO CONSTRUCTION PERSONNEL.
8. CATCH BASIN SHALL CONFORM TO DETAIL (30 C7.7) UNLESS OTHERWISE NOTED. REFER TO NOTE 21 OF THE GENERAL NOTES.
9. MANHOLES SHALL CONFORM TO CITY OF SEATTLE STANDARD PLANS AND NOTE 21 OF THE GENERAL NOTES. MANHOLES SHALL BE SIMILAR TO TYPE 200B, UNLESS OTHERWISE NOTED.
10. STORM DRAINAGE PIPE 12 INCHES AND LESS IN DIAMETER SHALL BE DUCTILE IRON CLASS 52 PIPE, CEMENT-MORTAR LINED. STORM DRAINAGE PIPE WITH AN INNER DIAMETER OF 21 INCHE SHALL BE CONCRETE, CLASS V PIPE. STORM DRAIN PIPE WITH AN INNER DIAMETER OF 72" SHALL BE CONCRETE PIPE, CLASS IV.
11. EXISTING STORM DRAINAGE MANHOLES, PIPE AND CATCH BASINS WITHIN THE LIMITS OF GRADING SHALL BE DEMOLISHED, UNLESS OTHERWISE NOTED.
12. WHERE A NEW PIPE CLEARS AN EXISTING OR NEW UTILITY BY 12 INCHES OR LESS, ETHAFOAM SHALL BE PLACED AS A CUSHION BETWEEN THE UTILITIES. FOR DETAIL, REFER TO (32 C7.8).
13. ALL UNDERGROUND AND AT GRADE STRUCTURES INCLUDIG MANHOLES, CATCH BASINS, HANDHOLES, VAULTS AND CLEANOUTS SHALL BE DESIGNED TO ACCOMMODATE A 100-KIP LOAD.
14. THE CONTRACTOR SHALL PROVIDE SAFE TRENCHING PRACTICES, INCLUDING SHORING WHERE NECESSARY. REFER TO SPECIFICATION SECTION 02165, "TRENCH SAFETY SYSTEMS."
15. RIDGE LINES REPRESENT FINISH GRADE TOP ELEVATIONS AS LISTED ON GRADING AND DRAINAGE PLANS. AREAS ARE 15,000 SQUARE FEET MAXIMUM WITH FLOW LINES TO CATCH BASINS. RIDGE LINES ILLUSTRATE GRADING WHERE CONTOURS CANNOT BE REPRESENTED IN FLAT AREAS.
16. FOR CONTINUATION, SEE MECHANICAL PLANS.
17. THE STORM DRAIN SYSTEM SHALL BE CONSTRUCTED ACCORDING TO THE APPROVED PLANS IN THIS BUILDING PERMIT PLAN SET AND ON FILE IN THE CITY OF SEATTLE STREET USE SECTION. ANY DEVIATION FROM THE APPROVED WILL REQUIRE WRITTEN APPROVAL FROM THE CITY OF SEATTLE DEPARTMENT OF CONSTRUCTION AND LAND USE, THE STREET USE SECTION, OR BOTH.
18. A COPY OF THESE APPROVED PLANS MUST BE ON THE JOB SITE WHENEVER CONSTRUCTION IS IN PROGRESS.
19. ALL REQUIRED STORM WATER FACILITIES MUST BE CONSTRUCTED AND IN OPERATION PRIOR TO ANY PAVING UNLESS OTHERWISE APPROVED BY THE CITY OF SEATTLE STREET USE SECTION.
20. VERTICAL DATUM: U.S.C. AND G.S. REFER TO THE TABLE BELOW FOR ELEVATION CONVERSIONS.

U.S.C. & G.S. ELEV.	C.O.S. ELEV.
0.	−12.23



kpff Consulting Engineers
1520 Fourth Avenue, Suite 500
Seattle, Washington 98101
(206) 382-0600 Fax (206) 382-0500

PROJECT ENGR./ARCH:	WMA
DESIGNER:	CJB
DRAWN BY:	MDD
SCALE:	1:50
DATE:	2-16-99
CHECKED BY:	WMA
APPROVED BY:	

NO.	DATE	BY	DESCRIPTION	APP'D
1	3-15-99	CJB	MH#39 & #40 ADJUSTED	
2	6-25-99	DJB	ADDED CB#47, MOVED CB#21	

SEATTLE IRON & METALS CORP.

SEATTLE IRON AND METALS
600 SOUTH GARDEN STREET
GRADING AND UTILITY IMPROVEMENTS
SITE DRAINAGE PLAN

WORK ORDER NO.
CONSULTANT'S NO. 96012
C7.2

NOTES:
JOB # 96012
JOB NAME: SEATTLE IRON AND METALS
SHEET: DRAINAGE, SWL BASE, TITLE
FILE PATH: H:\96012 SW\DRAWINGS\UTILITIES\DRAIN-ALLDWG
PLOTTED DATE & TIME: DEC. 15, 1999 6:13:59 PM
UPDATED BY: MMCD
PLOT SCALE: 1=1
PLOT SET UP: SWLPCP
P SPACE: YES
UCS: NONE
ORIGINAL TO: MMCD
DISCARD OLD #: NO
PRINTS: 1
PRINTS TO: CJB

Samples in vicinity of Seattle Iron and Metals (dry weight).

Sample ID	SQS/ LAET[b]	CSL/ 2LAET[c]	MH100B	RCB146	RCB147	RCB148	MH240	CB207	MH205	MH224	MH225	MH226	CB144	CB145
Lab Ref			NO90	NO90	NO90	NO90	PB20	PB20	OI27	OZ99	OZ99	OZ99	PA34	PA34
Type			Inline	RCB	RCB	RCB	Inline	CB	Inline	Inline	Inline	Inline	CB	CB
Outfall			S Myrtle St SD	S Garden St SD	S Myrtle St SD	S Myrtle St SD	S Garden St SD	S Garden St SD	S Brighton CSO/SD	S Brighton CSO/SD	S Brighton CSO/SD	S Brighton CSO/SD	8th Ave S (no SD)	CSS
Date			09/12/08	09/12/08	09/12/08	09/12/08	06/03/09	06/03/09	01/15/09	05/21/09	05/21/09	05/26/09	05/27/09	05/27/09
Total solids (%)			67.7	52.4	48.4	62.1	42.9	82	73.2	46.5	43.2	69.9	40.6	85.3
TOC (%)			6.89	6.85	5.25	9.40	18.7	11	3.56	6.75	5.5	5.29	7.06	2.22
Metals (mg/kg DW)														
Arsenic	57	93	20 U	20 U	12	20 U	40 J	60 J	125	30 J	40 J	58 J	20 J	20 J
Copper	390	390	500	1,020	365	386	2,200 J	7,990 J	209	227 J	335 J	273 J	668 J	876 J
Lead	450	530	675	670	428	467	1,710 J	2,240 J	121	222 J	473 J	757 J	1,180 J	1,480 J
Mercury	0.41	0.59	1.88	1.08	0.97	0.74	4.29 J	2.72 J	0.15	0.46 J	1.15 J	3.41 J	0.98 J	1.13 J
[illegible]	410	960	2,420	2,900	1,540	1,950	8,960 J	13,300 J	710	959 J	709 J	905 J	948 J	900 J
Total petroleum hydrocarbons (mg/kg DW)														
TPH -diesel			1,100	130	4,300	2,800	17,000	5,200	220	570	21,000	1,100	3,700	760
TPH-oil			5,100	760	11,000	10,000	60,000	15,000	920	1,400	30,000	4,900	4,500	2,100
LPAH (ug/kg DW)														
Acenaphthene	500	730	190 U	140 U	590 U	280	1,800 J	740 U	66	58 U	170 U	190 U	260 U	120 U
Acenaphthylene	1,300	1,300	190 U	140 U	590 U	260 U	2,700 U	740 U	39 U	58 U	170 U	190 U	260 U	120 U
Anthracene	960	4,400	190 U	130 J	590 U	450	3,200	740 U	180	33 J	170 U	170 J	260 U	120 U
Fluorene	540	1,000	190 U	100 J	590 U	490	4,600	740 U	70	58 U	170 U	190 U	160 J	120 U
Naphthalene	2,100	2,400	190 U	110 J	1,000	970	4,100	740 U	39 U	58 U	170 U	190 U	260 U	120 U
Phenanthrene	1,500	5,400	320	800	570 J	2,600	16,000	2,100	440	180	170 U	1,200	430	190
Total LPAH	5,200	13,000	320	1,140 J	1,570 J	4,790	29,700 J	2,100	756	213 J	170 U	1,370 J	590 J	190
HPAH (ug/kg DW)														
Benzo(a)anthracene	1,300	1,600	290	450	330 J	950	5,100	1,200	260	130	160 J	960	200 J	180
Benzo(a)pyrene	1,600	3,000	580	490	590 U	670	4,000	940	330	130	220	1,200	190 J	190 J
Benzo(b)fluoranthene	3,200	3,600	680	820	490 J	900	4,100	1,200	440	180	320	1,000	200 J	200 J
[illegible]o(g,h,i)perylene	670	720	410	280	590 U	250 J	2,700 U	740 U	180	65	160 J	860	160 J	140 J
Benzo(k)fluoranthene	3,200	3,600	660	1,000	540 J	870	4,100	1,200	310	180	190	1,100	200 J	200 J
Chrysene	1,400	2,800	490	1,200	620	1,500	7,300	1,800	390	200	540	1,500	520	400
Dibenzo(a,h)anthracene	230	540	95 J	92 J	590 U	260 U	2,700 U	740 U	25 J	58 U	170 U	130 J	260 U	120 U
Fluoranthene	1,700	2,500	770	1,800	1,100	3,000	16,000	3,700	780	350	430	2,200	560	450
Indeno(1,2,3-c,d)pyrene	600	690	290	220	590 U	170 J	2,700 U	740 U	170	50 J	100 J	620	260 U	110 J
Pyrene	2,600	3,300	660	1,800	1,100	3,400	15,000	3,200	790	290	1,700	1,700	750	340
Total HPAH	12,000	17,000	4,925 J	8,152 J	4,180 J	11,710 J	55,600	13,240	3,675 J	1,575 J	3,820 J	11,270 J	2,780 J	2,210 J
Phthalates (ug/kg DW)														
Bis(2-ethylhexyl)phthalate	1,300	1,900	3,000	47,000	35,000	36,000	210,000	62,000	2,300	1,100	5,000	1,300	14,000 B	3,400 B
Butylbenzylphthalate	63	900	1,500	2,100	1,900	4,400	12,000	6,000	110	220	170 U	340	2,100	360
Diethylphthalate	200	1,200	190 U	140 U	590 U	360	2,700 U	740 U	39 U	58 U	170 U	190 U	260 U	120 U
Dimethylphthalate	71	160	200	360	590 U	230 J	4,200	1,400	39 U	35 J	170 U	190 U	260 U	120 U
Di-n-butylphthalate	1,400	5,100	400	750	1,100	670	2,600 J	2,300	36 J	49 J	170 U	130 J	420	220

Samples in vicinity of Seattle Iron and Metals (dry weight).

Sample ID	SQS/ LAET[b]	CSL/ 2LAET[c]	MH100B	RCB146	RCB147	RCB148	MH240	CB207	MH205	MH224	MH225	MH226	CB144	CB145
Lab Ref			NO90	NO90	NO90	NO90	PB20	PB20	OI27	OZ99	OZ99	OZ99	PA84	PA84
Type			Inline	RCB	RCB	RCB	Inline	CB	Inline	Inline	Inline	Inline	CB	CB
Outfall			S Myrtle St SD	S Garden St SD	S Myrtle St SD	S Myrtle St SD	S Garden St SD	S Garden St SD	S Brighton CSO/SD	S Brighton CSO/SD	S Brighton CSO/SD	S Brighton CSO/SD	8th Ave S (no SD)	CSS
Date			09/12/08	09/12/08	09/12/08	09/12/08	06/03/09	06/03/09	01/15/09	05/21/09	05/21/09	05/26/09	05/27/09	05/27/09
Di-n-octyl phthalate	6,200	NA	190	1,100	1,500	2,900	23,000	6,000	200	41 J	130 J	190 U	850	170
PCBs (ug/kg DW)														
1016			200 U	200 U	58 U	400 U	420 U	470 U	18 U	20 U	20 U	97 U	760 U	1,400 U
1221			200 U	200 U	58 U	400 U	420 U	470 U	18 U	20 U	20 U	97 U	760 U	1,400 U
1232			200 U	200 U	58 U	400 U	420 U	470 U	18 U	20 U	20 U	97 U	760 U	1,400 U
1242			200 U	200 U	58 U	400 U	17,000	470 U	18 U	20 U	20 U	97 U	760 U	1,400 U
[illegible]			390 Y	860	240	1,600	420 U	7,100	30	20 U	99 Y	97 U	760 U	1,400 U
[illegible]			1,200	1,200	360	2,100	6,400	8,600	61	34	370	97 U	1,800	3,800
1260			350	500	94	400 U	1,600 J	2,600 J	57	39 J	410	350	1,800	3,100
Total PCBs	130	1,000	1,550	2,560	694	3,700	25,000 J	18,300 J	148	73 J	780	350	3,600	6,900
Other organic compounds (ug/kg DW)														
1,2,4-Trichlorobenzene			190 U	140 U	590 U	260 U	2,700 U	740 U	39 U	58 U	170 U	190 U	260 U	120 U
1,2-Dichlorobenzene			190 U	140 U	590 U	260 U	2,700 U	740 U	33 J	58 U	170 U	190 U	260 U	120 U
1,3-Dichlorobenzene			190 U	140 U	590 U	260 U	2,700 U	740 U	39 U	58 U	170 U	190 U	260 U	120 U
1,4-Dichlorobenzene			190 U	140 U	590 U	260 U	2,700 U	740 U	29 J	58 U	170 U	190 U	260 U	120 U
2,2'-Oxybis(1-chloropropane)			190 U	140 U	590 U	260 U	2,700 U	740 U	39 U	58 U	170 U	190 U	260 U	120 U
2,4,5-Trichlorophenol			940 U	720 U	2,900 U	780 J	13,000 U	3,700 U	200 U	290 U	830 U	970 U	1,300 U	620 U
2,4,6-Trichlorophenol			940 U	720 U	2,900 U	1,300 U	13,000 U	3,700 U	200 U	290 U	830 U	970 U	1,300 U	620 U
2,4-Dichlorophenol			940 U	720 U	2,900 U	1,300 U	13,000 U	3,700 U	200 U	290 U	830 U	970 U	1,300 U	620 U
2,4-Dimethylphenol[a]	29	29	190 U	140 U	590 U	260 U	2,700 U	740 U	39 U	58 U	170 U	190 U	260 U	120 U
2,4-Dinitrophenol			1,900 U	1,400 U	5,900 U	2,600 U	27,000 U	7,400 U	390 U	580 U	1,700 U	1,900 U	2,600 U	1,200 U
2,4-Dinitrotoluene			940 U	720 U	2,900 U	1,300 U	13,000 U	3,700 U	200 U	290 U	830 U	970 U	1,300 U	620 U
2,6-Dinitrotoluene			940 U	720 U	2,900 U	1,300 U	13,000 U	3,700 U	200 U	290 U	830 U	970 U	1,300 U	620 U
[illegible]loronaphthalene			190 U	140 U	590 U	260 U	2,700 U	740 U	39 U	58 U	170 U	190 U	260 U	120 U
2-Chlorophenol			190 U	140 U	590 U	260 U	2,700 U	740 U	39 U	58 U	170 U	190 U	260 U	120 U
2-Methylnaphthalene			190 U	130 J	3,600	1,900	13,000	740 U	20 J	58 U	170 U	190 U	180 J	120 U
2-Methylphenol[a]			190 U	140 U	590 U	260 U	2,700 U	740 U	39 U	58 U	170 U	190 U	260 U	120 U
2-Nitroaniline			940 U	720 U	2,900 U	1,300 U	13,000 U	3,700 U	200 U	290 U	830 U	970 U	1,300 U	620 U
2-Nitrophenol			940 U	720 U	2,900 U	1,300 U	13,000 U	3,700 U	200 U	290 U	830 U	970 U	1,300 U	620 U
3,3'-Dichlorobenzidine			940 U	720 U	2,900 U	1,300 U	13,000 U	3,700 U	200 U	290 U	830 U	970 U	1,300 U	620 U
3-Nitroaniline			940 U	720 U	2,900 U	1,300 U	13,000 U	3,700 U	200 U	290 U	830 U	970 U	1,300 U	620 U
4,6-Dinitro-2-methylphenol			1,900 U	1,400 U	5,900 U	2,600 U	27,000 U	7,400 U	390 U	580 U	1,700 U	1,900 U	2,600 U	1,200 U
4-Bromophenyl-phenylether			190 U	140 U	590 U	260 U	2,700 U	740 U	39 U	58 U	170 U	190 U	260 U	120 U
4-Chloro-3-methylphenol			940 U	720 U	2,900 U	1,300 U	13,000 U	3,700 U	200 U	290 U	830 U	970 U	1,300 U	620 U
4-Chloroaniline			940 U	720 U	2,900 U	1,300 U	13,000 U	3,700 U	200 U	290 U	830 U	970 U	1,300 U	620 U
4-Chlorophenyl-phenylether			190 U	140 U	590 U	260 U	2,700 U	740 U	39 U	58 U	170 U	190 U	260 U	120 U
4-Methylphenol[a]	670	670	190 U	140 U	18,000	2,600	2,700 U	740 U	39 U	58 U	170 U	190 U	2,300	92 J

Samples in vicinity of Seattle Iron and Metals (dry weight).

Sample ID	SQS/ LAET[b]	CSL/ 2LAET[c]	MH100B	RCB146	RCB147	RCB148	MH240	CB207	MH205	MH224	MH225	MH226	CB144	CB145
Lab Ref			NO90	NO90	NO90	NO90	PB20	PB20	OI27	OZ99	OZ99	OZ99	PA34	PA34
Type			Inline	RCB	RCB	RCB	Inline	CB	Inline	Inline	Inline	Inline	CB	CB
Outfall			S Myrtle St SD	S Garden St SD	S Myrtle St SD	S Myrtle St SD	S Garden St SD	S Garden St SD	S Brighton CSO/SD	S Brighton CSO/SD	S Brighton CSO/SD	S Brighton CSO/SD	8th Ave S (no SD)	CSS
Date			09/12/08	09/12/08	09/12/08	09/12/08	06/03/09	06/03/09	01/15/09	05/21/09	05/21/09	05/26/09	05/27/09	05/27/09
4-Nitroaniline			940 U	720 U	2,900 U	1,300 U	13,000 U	3,700 U	200 U	290 U	830 U	970 U	1,300 U	620 U
4-Nitrophenol			940 U	720 U	2,900 U	1,300 U	13,000 U	3,700 U	200 U	290 U	830 U	970 U	1,300 U	620 U
Benzoic acid[a]	650	650	1,900 U	1,400 U	5,900 U	2,600 U	27,000 U	7,400 U	390 U	580 U	1,700 U	1,900 U	2,600 U	1,200 U
Benzyl alcohol[a]			190 U	140 U	590 U	260 U	2,700 U	740 U	110	58 U	170 U	190 U	510	120 U
bis(2-Chloroethoxy) methane			190 U	140 U	590 U	260 U	2,700 U	740 U	39 U	58 U	170 U	190 U	260 U	120 U
Bis-(2-chloroethyl) ether			190 U	140 U	590 U	260 U	2,700 U	740 U	39 U	58 U	170 U	190 U	260 U	120 U
Carbazole			190 U	**140**	590 U	**310**	**1,500** J	740 U	**85**	58 U	170 U	**110** J	260 U	120 U
Dibenzofuran			190 U	140 U	590 U	260 U	2,700 U	740 U	**36** J	58 U	170 U	190 U	260 U	120 U
Hexachlorobenzene			190 U	140 U	590 U	260 U	2,700 U	740 U	39 U	58 U	170 U	190 U	260 U	120 U
Hexachlorobutadiene			190 U	140 U	590 U	260 U	2,700 U	740 U	39 U	58 U	170 U	190 U	260 U	120 U
Hexachlorocyclopentadiene			940 U	720 U	2,900 U	1,300 U	13,000 U	3,700 U	200 U	290 U	830 U	970 U	1,300 U	620 U
Hexachloroethane			190 U	140 U	590 U	260 U	2,700 U	740 U	39 U	58 U	170 U	190 U	260 U	120 U
Isophorone			190 U	140 U	590 U	260 U	2,700 U	740 U	39 U	58 U	170 U	190 U	260 U	120 U
Nitrobenzene			190 U	140 U	590 U	260 U	2,700 U	740 U	39 U	58 U	170 U	190 U	260 U	120 U
N-Nitroso-di-n-propylamine			940 U	720 U	2,900 U	1,300 U	13,000 U	3,700 U	200 U	290 U	830 U	970 U	1,300 U	620 U
N-Nitrosodiphenylamine			190 U	140 U	590 U	260 U	2,700 U	740 U	39 U	58 U	660 Y	190 U	260 U	120 U
Pentachlorophenol[a]	360	690	940 U	720 U	2,900 U	1,300 U	13,000 U	3,700 U	200 U	290 U	830 U	970 U	1,300 U	620 U
Phenol[a]	420	1,200	190 U	180 U	850 U	890 U	2,700 U	740 U	**28** J	58 U	170 U	190 U	**210** J	120 U

a. Sediment management standards based on dry weight concentration.
b. Sediment quality standard/lowest apparent effects threshold
c. Cleanup screening level/second lowest apparent effects threshold
Bold = Compound detected in sample.

RCB = Right-of-way catch basin
CB = Onsite catch basin
CSS = Combined sewer system
Inline = Inline grab sample
Dirt = Street dirt sample

J Value is an estimate
U Target analyte not detected at the reported concentration
R Analytical result is rejected and cannot be used.
Y Analyte is not detected at or above the reported concentration. The reporting limit is raised due to chromatographic interference. Y flag is equivalent to U flag with a raised reporting limit.

Exceeds SQS/LAET
Exceeds CSL/2LAET

Samples in vicinity of Seattle Iron and Metals (dry weight).

Sample ID	SQS/ LAET[b]	CSL/ 2LAET[c]	CB148	CB147	CB148	CB149	CB157-F	CB157S	RD1	RD2	RGB189F
Lab Ref			PA34	PA34	PA34	PA34	QW05	QW05	QW05	QW05	QW05
Type			Dirt	Dirt	Dirt	Dirt	CB	CB	Roof drain	Roof drain	SD
Outfall		S	CSS	CSS	CSS	8th Ave S (no SD)	S Myrtle St SD	S Myrtle St SD	S Myrtle St SD	S Myrtle St SD	S Myrtle St SD
Date			05/27/09	05/27/09	05/27/09	05/27/09	05/11/10	05/11/10	05/11/10	05/11/10	5/11/10
Total solids (%)			93.3	98.6	94.7	99.7	67.3	46.2	49.2	29.6	65.9
TOC (%)			1.42	3.59	1.7	1.74	4.59	6.7	10.1	8.37	4.85
Metals (mg/kg DW)											
Arsenic	57	93	8 J	10 J	6 J	10 UJ	40 U	30 U	20 U	40 U	20 U
Copper	390	390	48.7 J	224 J	83.2 J	67.8 J	1,890	2,240	1,090	975	3,280
Lead	450	530	71 J	400 J	155 J	52 J	1,260	1,380	1,410	1,700	904
Mercury	0.41	0.59	0.15 J	0.41 J	0.23 J	0.03 J	0.8	1.55	0.92	2.56	0.66
	410	960	97 J	391 J	130 J	201 J	4,940	5,880	5,370	8,310	3,890
Total petroleum hydrocarbons (mg/kg DW)											
TPH -diesel			190	530	400	84	840	970	210	190	1,800
TPH-oil			600	2,200	940	760	6,200	8,200	2,400	1,700	8,600
LPAH (ug/kg DW)											
Acenaphthene	500	730	58 U	110 U	57 U	58 U	220 U	250 U	88 U	150 U	330 U
Acenaphthylene	1,300	1,300	58 U	110 U	57 U	58 U	220 U	250 U	88 U	150 U	330 U
Anthracene	960	4,400	58 U	110 U	57 U	58 U	130 J	200 J	88 U	190	200 J
Fluorene	540	1,000	58 U	110 U	57 U	58 U	220 U	250 U	88 U	86 J	240 J
Naphthalene	2,100	2,400	58 U	110 U	57 U	58 U	150 J	210 J	66 J	130 J	470
Phenanthrene	1,500	5,400	160	81 J	94	58 U	900	880	640	1,100	1,600
Total LPAH	5,200	13,000	160	81 J	94	58 U	1,180 J	1,290 J	706 J	1,506 J	2,510 J
HPAH (ug/kg DW)											
Benzo(a)anthracene	1,300	1,600	100	76 J	58	58 U	550 J	800 J	440	720	610 J
Benzo(a)pyrene	1,600	3,000	140 J	93 J	81 J	58 U	440	580	670	1,000	520
Benzo(b)fluoranthene	3,200	3,600	150 J	92 J	66 J	58 U	590	890	700	1,500	610
Benzo(g,h,i)perylene	670	720	73 J	55 J	36 J	58 U	180 J	270	290	440	220 J
Benzo(k)fluoranthene	3,200	3,600	95 J	92 J	66 J	58 U	590	890	700	1,500	610
Chrysene	1,400	2,800	160	230	96	83	990	1,600	1,400	1,300	1,300
Dibenzo(a,h)anthracene	230	540	58 U	110 U	57 U	58 U	55 J	250 U	70 J	120 J	330 U
Fluoranthene	1,700	2,500	300	200	140	29 J	1,700	2,400	1,400	2,600	2,200
Indeno(1,2,3-c,d)pyrene	600	690	67 J	110 U	57 U	58 U	130 J	200 J	170	360	330 U
Pyrene	2,600	3,300	170	140	110	58 U	1,100	1,500	910	1,400	1,700
Total HPAH	12,000	17,000	1,255 J	978 J	653	112 J	6,325 J	9,130 J	6,750 J	10,940 J	7,770 J
Phthalates (ug/kg DW)											
Bis(2-ethylhexyl)phthalate	1,300	1,900	63 U	2,000 B	290 U	360 U	33,000	41,000	11,000	12,000	84,000
Butylbenzylphthalate	63	900	58 U	420	57 U	58 U	5,000	4,300	2,200	4,600	6,200
Diethylphthalate	200	1,200	58 U	110 U	57 U	58 U	220 U	250 U	88 U	150 U	330 U
Dimethylphthalate	71	160	58 U	110 U	57 U	35 J	2,500	620	510	1,100	870
Di-n-butylphthalate	1,400	5,100	58 U	100 J	57 U	58 U	1,500	1,200	670	2,200	3,200

Samples in vicinity of Seattle Iron and Metals (dry weight).

Sample ID	SQS/ LAET[b]	CSL/ 2LAET[c]	CB146	CB147	CB148	CB149	CB157-F	CB157S	RD1	RD2	RCB189F
Lab Ref			PA34	PA34	PA34	PA34	QW05	QW05	QW05	QW05	QW05
Type			Dirt	Dirt	Dirt	Dirt	CB	CB	Roof drain	Roof drain	SD
Outfall		S	CSS	CSS	CSS	8th Ave S (no SD)	S Myrtle St SD	S Myrtle St SD	S Myrtle St SD	S Myrtle St SD	S Myrtle St SD
Date			05/27/09	05/27/09	05/27/09	05/27/09	05/11/10	05/11/10	05/11/10	05/11/10	5/11/10
Di-n-octyl phthalate	6,200	NA	58 U	98 J	57 U	38 J	2,200	3,400	920	970	3,500
PCBs (ug/kg DW)											
1016			19 U	290 U	19 U	19 U	48 U	60 U	40 U	66 U	34 U
1221			19 U	290 U	19 U	19 U	48 U	60 U	40 U	66 U	34 U
1232			19 U	290 U	19 U	19 U	48 U	60 U	40 U	66 U	34 U
1242			19 U	290 U	19 U	19 U	48 U	60 U	40 U	66 U	34 U
1248			19 U	290 U	19 U	19 U	1,300	1,400	570	1,800	1,300
[illegible]			52	590	130	26	1,400	2,200	1,100	2,200	1,400
1260			130 J	750	400	34	260	420	260	570	250
Total PCBs	130	1,000	182 J	1,340	530	60	2,960	4,020	1,930	4,570	1,650
Other organic compounds (ug/kg DW)											
1,2,4-Trichlorobenzene			58 U	110 U	57 U	58 U	220 U	250 U	88 U	150 U	330 U
1,2-Dichlorobenzene			58 U	110 U	57 U	58 U	220 U	250 U	88 U	150 U	330 U
1,3-Dichlorobenzene			58 U	110 U	57 U	58 U	220 U	250 U	88 U	150 U	330 U
1,4-Dichlorobenzene			58 U	110 U	57 U	58 U	220 U	250 U	88 U	150 U	330 U
2,2'-Oxybis(1-chloropropane)			58 U	110 U	57 U	58 U	220 U	250 U	88 U	150 U	330 U
2,4,5-Trichlorophenol			290 U	530 U	280 U	290 U	1,100 U	1,200 U	440 U	730 U	1,600 U
2,4,6-Trichlorophenol			290 U	530 U	280 U	290 U	1,100 U	1,200 U	440 U	730 U	1,600 U
2,4-Dichlorophenol			290 U	530 U	280 U	290 U	1,100 U	1,200 U	440 U	730 U	1,600 U
2,4-Dimethylphenol[a]	29	29	58 U	110 U	57 U	58 U	220 U	250 U	88 U	150 U	330 U
2,4-Dinitrophenol			580 U	1,100 U	570 U	580 U	2,200 U	2,500 U	880 U	1,500 U	3,300 U
2,4-Dinitrotoluene			290 U	530 U	280 U	290 U	1,100 U	1,200 U	440 U	730 U	1,600 U
2,6-Dinitrotoluene			290 U	530 U	280 U	290 U	1,100 U	1,200 U	440 U	730 U	1,600 U
[illegible]oronaphthalene			58 U	110 U	57 U	58 U	220 U	250 U	88 U	150 U	330 U
2-[illegible]lorophenol			58 U	110 U	57 U	58 U	220 U	250 U	88 U	150 U	330 U
2-Methylnaphthalene			58 J	110 U	47 J	58 U	150 J	250	64 J	170	980
2-Methylphenol[a]			58 U	110 U	57 U	58 U	220 U	250 U	88 U	150 U	330 U
2-Nitroaniline			290 U	530 U	280 U	290 U	1,100 U	1,200 U	440 U	730 U	1,600 U
2-Nitrophenol			290 U	530 U	280 U	290 U	220 U	250 U	88 U	150 U	330 U
3,3'-Dichlorobenzidine			290 U	530 U	280 U	290 R	1,100 U	1,200 U	440 U	730 U	1,600 U
3-Nitroaniline			290 U	530 U	280 U	290 R	1,100 U	1,200 U	440 U	730 U	1,600 U
4,6-Dinitro-2-methylphenol			580 U	1,100 U	570 U	580 R	2,200 U	2,500 U	880 U	1,500 U	3,300 U
4-Bromophenyl-phenylether			58 U	110 U	57 U	58 U	220 U	250 U	88 U	150 U	330 U
4-Chloro-3-methylphenol			290 U	530 U	280 U	290 U	1,100 U	1,200 U	440 U	730 U	1,600 U
4-Chloroaniline			290 U	530 U	280 U	290 R	1,100 U	1,200 U	440 U	730 U	1,600 U
4-Chlorophenyl-phenylether			58 U	110 U	57 U	58 U	220 U	250 U	88 U	150 U	330 U
4-Methylphenol[a]	670	670	58 U	110 U	57 U	58 U	330	7,800	88 U	150 U	330 U

Samples in vicinity of Seattle Iron and Metals (dry weight).

Sample ID	SQS/ LAET[b]	CSL/ 2LAET[b]	CB146	CB147	CB148	CB149	CB157-F	CB157S	RD1	RD2	RCB189F
Lab Ref			PA34	PA34	PA34	PA34	QW05	QW05	QW05	QW05	QW05
Type			Dirt	Dirt	Dirt	Dirt	GB	GB	Roof drain	Roof drain	SD
Outfall		S	CSS	CSS	CSS	8th Ave S (no SD)	S Myrtle St SD	S Myrtle St SD	S Myrtle St SD	S Myrtle St SD	S Myrtle St SD
Data			05/27/09	05/27/09	05/27/09	05/27/09	05/11/10	05/11/10	05/11/10	05/11/10	5/11/10
4-Nitroaniline			290 U	530 U	280 U	290 U	1,100 U	1,200 U	440 U	730 U	1,600 U
4-Nitrophenol			290 U	530 U	280 U	290 R	1,100 U	1,200 U	440 U	730 U	1,600 U
Benzoic acid[a]	650	650	580 U	1,100 U	570 U	580 R	870 J	1,100 J	590 J	1,500 U	3,300 U
Benzyl alcohol[a]			58 U	110 U	57 U	58 U	220 U	250 U	88 U	150 U	440
bis(2-Chloroethoxy) methane			58 U	110 U	57 U	58 U	220 U	250 U	88 U	150 U	330 U
Bis-(2-chloroethyl) ether			58 U	110 U	57 U	58 U	220 U	250 U	88 U	150 U	330 U
Carbazole			58 U	110 U	57 U	58 U	220 U	250 U	120	200	190 J
Dibenzofuran			58 U	110 U	57 U	58 U	220 U	250 U	88 U	150 U	330 U
Hexachlorobenzene			58 U	110 U	57 U	58 U	220 U	250 U	88 U	150 U	330 U
Hexachlorobutadiene			58 U	110 U	57 U	58 U	220 U	250 U	88 U	150 U	330 U
Hexachlorocyclopentadiene			290 U	530 U	280 U	290 U	1,100 U	1,200 U	440 U	730 U	1,600 U
Hexachloroethane			58 U	110 U	57 U	58 U	220 U	250 U	88 U	150 U	330 U
Isophorone			58 U	110 U	57 U	58 U	220 U	250 U	88 U	150 U	330 U
Nitrobenzene			58 U	110 U	57 U	58 U	220 U	250 U	88 U	150 U	330 U
N-Nitroso-di-n-propylamine			290 U	530 U	280 U	290 U	1,100 U	1,200 U	440 U	730 U	1,600 U
N-Nitrosodiphenylamine			58 U	110 U	57 U	58 U	220 U	250 U	88 U	150 U	330 U
Pentachlorophenol[a]	360	690	290 U	530 U	280 U	290 R	1,100 U	1,200 U	440 U	730 U	1,600 U
Phenol[a]	420	1,200	58 U	110 U	57 U	58 U	420	1,300	240	320	330 U

Seattle Iron and Metals

Sample Locations (May 11, 2010)

Legend

Utilities
- Storm drain
- Sanitary sewer
- Combined sewer
- King County intercepter

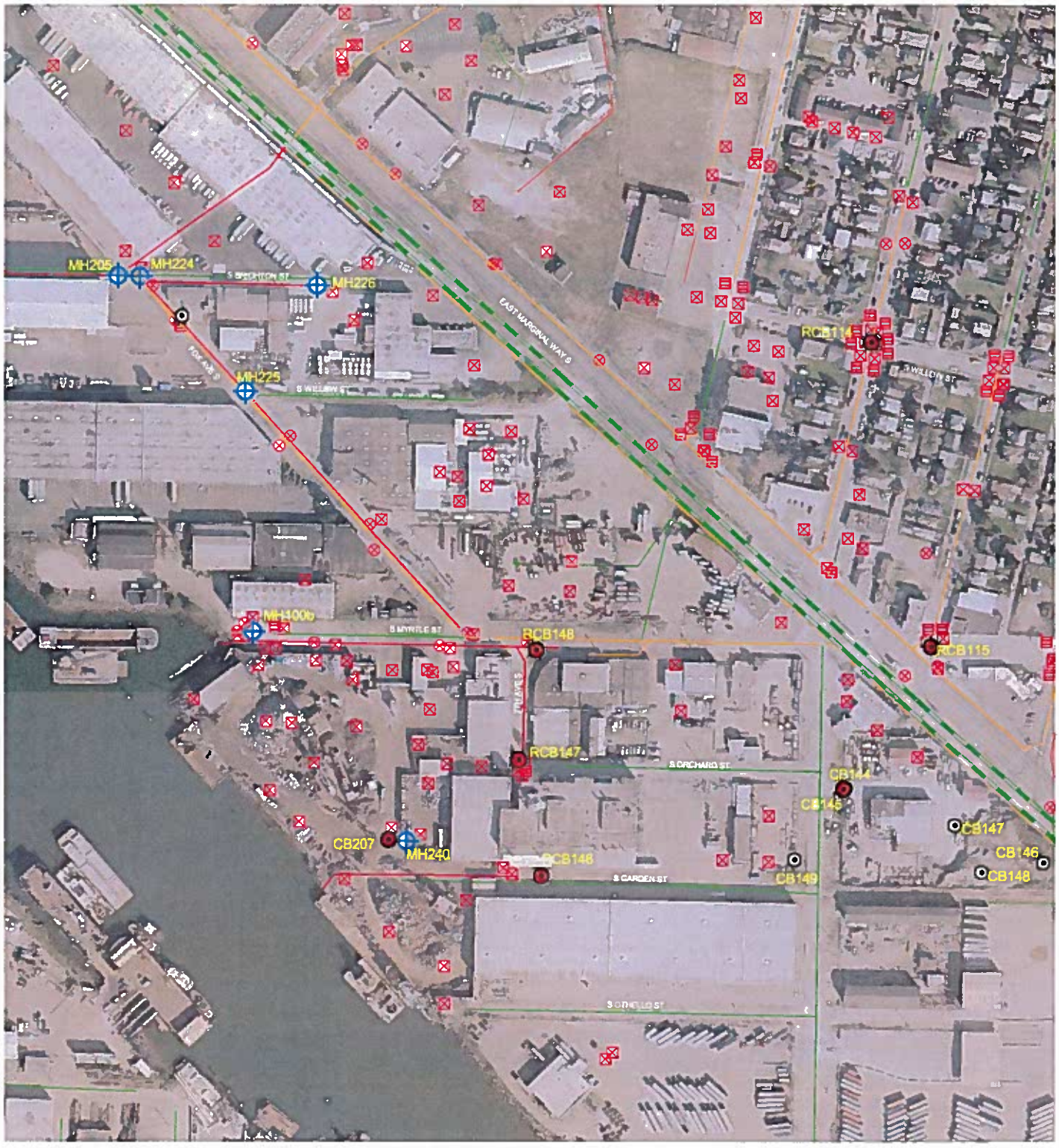
Sample locations (sediment)
- Onsite catch basin
- Right-of-way catch basin
- Roof

Structures
- Maintenance hole
- Catch basin
- Outfall

N W E S

50 0 50 100 Feet

Produced by the City of Seattle



Seattle Iron and Metals

Sample Locations

Produced by the City of Seattle

Legend

Utilities

- Storm drain
- Sanitary sewer
- Combined sewer
- King County intercepter

Sample locations

- Onsite catch basin
- ROW catch basin
- Street dirt
- Sediment trap
- Inline grab

0.5 0 0.5 Miles

State of Washington Department of Ecology
Northwest Regional Office

STORMWATER COMPLIANCE INSPECTION REPORT

General Data

Inspection Date	NPDES Permit #	County	Receiving Waters	Inspector(s)	Fac Type
03/29/06	SO3003645C	King	Duwamish Waterway	Greg Stegman	Industrial

Weather at time of inspection: Clear

Discharges to: Surface Water ☒ Ground Water ☐ Discharge location: N 47 32' 21.8"; W 122 19' 31.5" (NAD83)

Facility Data

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Seattle Iron and Metal Corporation 601 S Myrtle St. Seattle, WA 98108 Facility entrance location: N 47 32' 16.5"; W 122 19' 36.5" (NAD83)	10:00 am	09/20/02
	Exit Time 11:50 am	Permit Expiration Date 09/20/07

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)	Additional Participants:
Eric Paul 206-682-0040	Megan Wisdom, Ecology

Mailing Address of Responsible Official/Title/Phone and Fax Number.	
Eric Paul Seattle Iron and Metal Corporation 601 S Myrtle St. Seattle, WA 98108	Samples Taken? No Photos Taken? Yes
Phone number (206) 682-0040 Announced Inspection	

CONCERNS AND RECOMMENDATIONS

- The Administrative Order (Order) issued to Seattle Iron and Metal Corporation has not been rescinded. Contact John Drabeck (425) 649-7293 with any questions regarding compliance with the Order and individual permit application process.
- The total zinc value for the second quarter of 2005 has exceeded the benchmark value described in Industrial Stormwater General Permit (permit) condition S4.D.2, therefore consult permit condition S4.C for the appropriate response.
- There were petroleum stains around the stationary fueling station. To prevent petroleum contamination of stormwater, implement the necessary fueling station operational and/or source control Best Management Practices (BMPs).

For assistance with any of these compliance issues or recommendation regarding BMPs see the Stormwater Management Manual for Western Washington, volumes IV and V (SWMM). To obtain a copy of the SWMM you may go to Ecology's website at: http://www.ecy.wa.gov/programs/wq/stormwater/manual.html

BACKGROUND
Seattle Iron and Metals Corporation (SIMC) uses a metal shredder, a shearing machine and torches to break up larger pieces of ferrous and non-ferrous metals into small bits that are then sold to recyclers. On May 28, 1999 an Administrative Order (Order) was issued to SIMC and remains in effect. The Order required SIMC to apply for an Individual State Waste Discharge Permit (individual permit), which they have done. In addition, the Order requires monitoring of the facility's stormwater discharges. The individual permit application is being processed by John Drabeck of Ecology. Seattle Iron and Metal is still required to comply with all terms of the Order, until the issuance of the individual permit. The facility also is covered by an Industrial Stormwater General Permit (general permit). The general permit will remain in effect until the individual permit is issued. The Department of Ecology (Ecology) has conducted an inspection at this facility in the past. The purpose of this inspection is to respond to a complaint and to conduct a compliance inspection per the requirement of the Revised Code of Washington (RCW) 90.48.560. The complaint concerned pictures, that Ecology received on February 17 2006, showing scrap metal from the SIMC site spilling down the bank towards the Duwamish Waterway. Eric Paul, representing SIMC, affirmed that the picture was at his facility and told us that they had cleaned up the area using a giant magnet and installed an additional barrier in the area to prevent future material overflow (photo P3290013).

Areas Evaluated During Inspection		
Stormwater Pollution Prevention Plan (SWPPP)	☒	Onsite: Yes
Permit	☒	Onsite: Yes
Visual Inspections	☒	Documented: Yes
Spill prevention and emergency cleanup plan	☒	Documented: Yes
Employee training for spill plan and SWPPP	☒	Documented: Yes
Discharge Monitoring Reports (DMRs)	☒	DMR concern(s): Parameter(s) above permit limit
Catch Basins	☒	Frequency of Cleaning: As needed Catch basin filters are changed as needed.
Oil/Water Separators	☐	Frequency of Cleaning: Unknown
Equipment/Vehicle Washing	☒	Conducted onsite: Yes Wash water drains to:Sanitary sewer
Outside Storage and Parking Areas	☒	Paved: Yes Sweeping Frequency: Daily Type of materials stored outside: See below Type of vehicles stored outside: Heavy equipment Stockpiles of scrap metal (photo P3290006) are located through out the site in various states of processing. Most stockpiles are uncovered and sorted by metal type. The facility does not take hazardous materials. Some potentially hazardous liquids are present in the junked cars, and are burned during the shredding process.
Fueling operations	☒	Conducted onsite: Yes Type: Stationary There were petroleum stains around the stationary fueling station.
Equipment/Vehicle Maintenance	☒	Conducted onsite: Yes Repair and maintenance performed outside: No
Treatment System, monitoring point and discharge point	☒	All stormwater on site is moved through a carefully designed and managed treatment system. The treatment system consists of flocculation and metal precipitation. Stormwater sampling is conducted at a spigot (Photo P3290016) tapped into the treatment plant's effluent pipe. Effluent from the treatment plant is then discharged into the Duwamish Waterway. Sampling is not

		conducted at the Duwamish Waterway outfall because the discharge at this point is a mixture of off site stormwater from Orchard Street and the treated stormwater from the facility.

For questions concerning this inspection report please contact Greg Stegman at (425)-649-7019, gste461@ecy.wa.gov or Washington State Department of Ecology, NWRO, 3190 160th Avenue SE, Bellevue, WA 98008-5452.

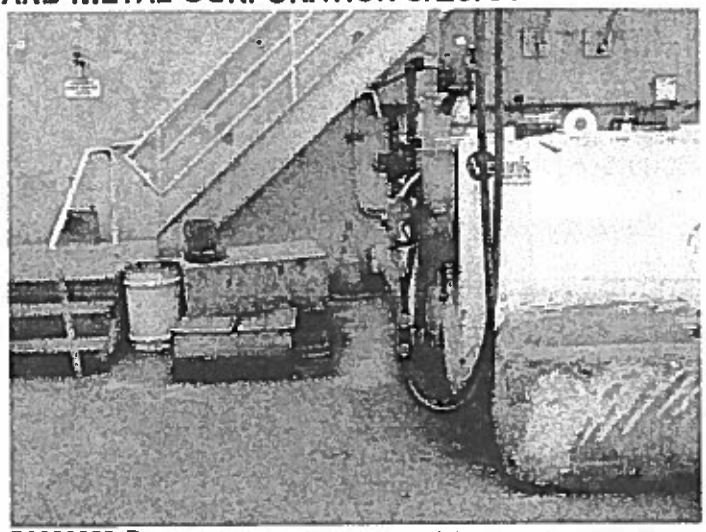
cc: Greg Stegman, Ecology

Signatures

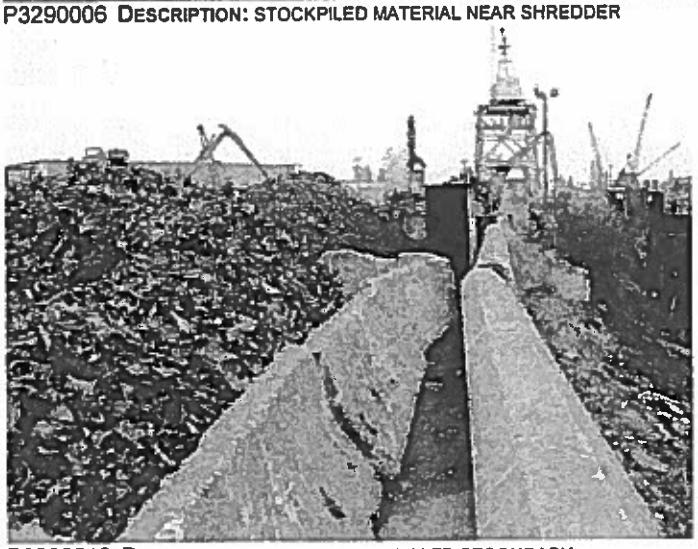
Gregory P. Stegman 06/28/06 Gregory P. Stegman Stormwater Inspector Water Quality Program	Date
Reviewed and approved by: Donald Seeberger 6/28/06 Donald Seeberger Unit Supervisor Water Quality Program	Date

PHOTO ADDENDUM – SEATTLE IRON AND METAL CORPORATION 3/29/06

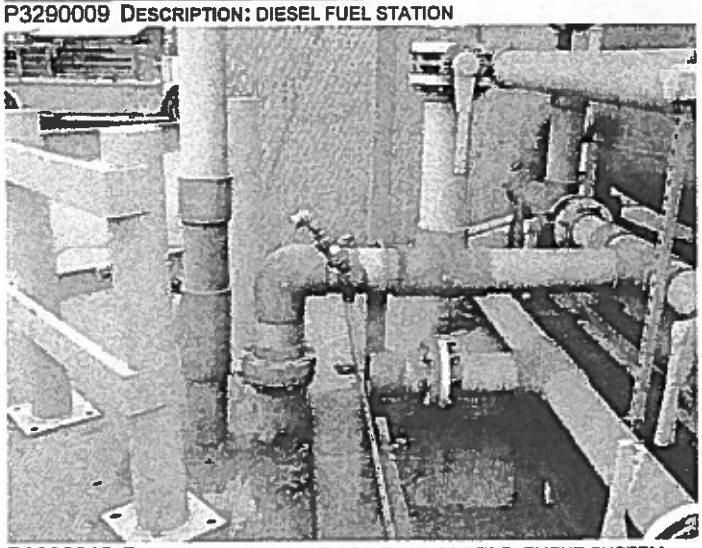
P3290006 DESCRIPTION: STOCKPILED MATERIAL NEAR SHREDDER



P3290009 DESCRIPTION: DIESEL FUEL STATION



P3290013 DESCRIPTION: RECENTLY INSTALLED SECONDARY CONTAINMENT AT SOUTHERN EDGE OF PROPERTY



P3290016 DESCRIPTION: SAMPLE POINT- WHERE TREATMENT SYSTEM DISCHARGES TO PIPE THAT EVENTUALLY DISCHARGES TO DUWAMISH.

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Northwest Regional Office • 3190 160th Avenue SE • Bellevue, Washington 98008-5452 • (425) 649-7000

August 28, 2006

Mr. Eric Paul
Seattle Iron & Metals Corp.
601 S. Myrtle St.
Seattle, WA 98108

CERTIFIED MAIL
7005 1820 0004 5364 0959

Dear Mr. Paul:

Re: Ecology's site visit on July 6, 2006 WAH000010678

Thank you and your staff for your time during Ecology's site visit. As we explained, Ecology is requesting a Sampling and Analysis Plan for all generators of auto shredder residue (ASR) and to fully designate the ASR for federal and state-only waste codes.

Our chemist, Alex Stone, reviewed your plan and I've included his comments in the enclosure. Please revise your Sampling and Analysis Plan to ensure it meets with our minimum requirements.

Ecology has concerns regarding the one ASR sample which you said recently failed for lead. Ecology's sampling protocol requires a 90% confidence level, which means additional sampling is required to fully designate the ASR. Please be advised that in the future should a sample fail, Seattle Iron & Metals shall conduct further sampling. Ecology recommends that you retain the sample material until you receive analytical results.

One concern which you will need to address is the sludge from the storm water treatment system. Prior to sending the sludge off-site for the next clean out, you will need to test it for the same metals as the ASR. If the material fails for metals then you will need to manage it as a hazardous waste. If it does not fail, then you will need to conduct a fish bioassay test to determine if it is a state-only hazardous waste.

If you have any questions please do not hesitate to contact me for any compliance issues at (360) 407-7553 or Alex Stone for any sampling plan questions at (360) 407-6344.

Sincerely,

David Misko

for Lisa Perle
NWRO, Ecology
Hazardous Waste and Toxics Reduction Program

cc: Dave Misko, Ecology-NWRO
Pinky Feria, Ecology-SWRO
Central Files, NWRO
RCRA Information

Ecology review of:

Auto Shredder Residue Sampling, Lab Analysis and Statistical Data Summary Plan
Prepared for Seattle Iron and Metals Corporation

General Comments:

1. There is no acknowledgement of requirements to address Washington state-only dangerous waste regulations. States that are delegated for the federal RCRA program as is Washington are required to be at least as stringent as RCRA. However the states are allowed to be more stringent that RCRA and Washington's dangerous waste regulations include a number of state-only criteria. You must evaluate your waste to determine whether it exceeds the state-only designation criteria. This document must provide a description of sampling and analyses that meet these requirements. Washington state-only designation criteria are described in WAC 173-303-100((5) and (6).

2. The SAP does not include any documentation requirements. An important aspect of any SAP is to identify how the sampling event is documented via the use of field log, notes, pictures, etc. The SAP needs to be expanded to include direction to the sampler to document the steps taken in addition to any deviations from the SAP and the reasons for the deviations. This documentation should include the time, the location, the amount of sample obtained, a description of the physical characteristics of the material, and any unusual observations.

3. The document does not indicate how you will determine if test results meet the 90% confidence interval for those samples that fail the dangerous waste criteria. Ecology's policy is that, if a test result indicates a waste exceeds a designation limit, the waste is assumed to be dangerous waste unless the test result can be proved to be either an "outlier" or not representative of the waste stream. In order to prove the sample is not representative, additional sampling would be required so the results demonstrate to a 90% confidence limit that the result is a true outlier. This information and discussion should be included in the SAP.

4. Although comments in this review are related to using this SAP on a routine basis, Ecology is interested in obtaining additional samples within a short timeframe to determine waste stream variability. Therefore, Ecology will discuss additional sampling events with you.

Specific Comments:

1. Purpose and Nature of Sampling and Analysis: This section neither references nor includes Washington dangerous waste requirements as a driver for the sampling effort. The document should indicate that a primary driver for the sampling event is that ASR has been identified as a solid waste subject to designation and must be analyzed to determine if any constituents exceed Washington's dangerous waste

requirements per WAC 173-303-090 through -110. ASR has been identified as a solid waste subject to designation and must be analyzed to determine if it exceeds Washington's dangerous waste characteristics and criteria. This section does refer to TSCA and Oregon DEQ requirements which are additional drivers. It should be indicated, however, that TSCA is primarily used for PCBs while dangerous waste requirements are primarily responsible for the other analyses. It would be appropriate to discuss both federal and state designation requirements at this point. Please re-write to expand upon the purposes for ASR sampling.

2. General Sampling Guidelines: The first paragraph indicates that "Samples are to be collected by personnel familiar with shredder operations....)." Please define the term "familiar." In addition, it is important that the sampler be knowledgeable concerning proper sampling techniques and the challenges of dealing with potentially dangerous waste. This section needs to be expanded to provide better definition and to indicate what minimum training requirements are needed.

3. General Sampling Guidelines: The third paragraph indicates that it is important to guarantee that the plant is operating normally and that "...the in-feed material should be representative of the facility's normal operation." Ecology strongly agrees on the importance of representative in-feed during ASR waste sampling, and believes that additional information should be collected prior to the sampling event. As indicated earlier, ASR is a very heterogeneous mixture. It is also dependent upon the material being processed at the time of collection. Therefore the SAP should include a requirement for the sampler to record the type of in-feed material being processed at the time of sampling and include documentation of the information in its field notes. With this information, the sampler will have documented evidence that its sample is representative of a typical in-feed operation. In addition, if any of the data indicate the ASR is a dangerous waste, this information may prove important in identifying possible in-feed materials that contribute to the problem and provide information to the facility which may prevent the problem from re-occurring. Please expand upon this section to include the requirement of documenting in-feed material descriptions during sampling.

4. Sampling: The first paragraph indicates federal sampling guidelines for stock piled material and contemporaneous sampling of ASR. It does not acknowledge, however, that there are additional sampling requirements to meet state dangerous waste requirements. Please expand to include state-only requirements.

5. Sampling: The sampling section needs to be expanded as it does not provide sufficient detail. For example, it does not explain how the samples will be collected, i.e. using a shovel or some other sampling device, whether disposable, sterile gloves will be placed over the heavier gloves and replaced during at each sampling aliquot, etc. It does not explain how the sampling event will be documented (field notes, pictures, etc.) and how any deviation will be recorded and explained. It does not include information how the integrity of the sample

will be maintained between aliquots. Ecology typically requires that samples be maintained t 4oC between collection and final delivery to the laboratory. In addition, it would be important to have a process which maintains the integrity of the sample between aliquots. For example, is a security tape placed on the 55-gallon drum between additions which certifies no contamination could occur or is it kept in a locked location which limits access? Ecology is not dictating what is done (within some limits), just indicating that additional detail needs to be added which guarantees the sample is both representative and obtained using the best sampling techniques.

6. Chain-of-custody: As a minor suggestion, it would be appropriate to indicate that all chain-of-custody procedures identified in EPA's sampling methodology, SW-846, will be followed.

7. Laboratory Quality Assurance and Quality Control: The document clearly identifies a level of QA/QC including the requirement for "...Matrix Spike, Matrix/Duplicate Matrix Spike and Laboratory Control Samples." SAP should clarify, however, whether individual aliquots will be obtained from the sample to run the Matrix Spike and Matrix/Duplicate Matrix Spike or if the laboratory batch runs will be used. If so, the differences between ASR and the laboratory batch analyses should be discussed.

WQ 6.1

State of Washington Department of Ecology
Northwest Regional Office
WATER COMPLIANCE INSPECTION REPORT

substitute for OMB No. 2040-0057 and EPA form 3560-3 (Rev. 9-94) (last file update 12-95.)

Section A: National Data System Coding (i.e., PCS)

Transaction Code	NPDES #	yr/mo/day	Inspection Type	Inspector	Fac Type
1 N 2 5	3 WA-003196-8 11	12 07/04/18 17	18 C	19 S	20 2

Remarks

Inspection work days	Facility Self-Monitoring Evaluation Rating	BI	QA	Reserved
67 0.0 69	70 2	71 N	72 N	73 ____ 74 75 ____ 80

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*
SEATTEL IRON AND METAL CORPORATION
601 S. MYRTLE STREET
SEATTLE, WA 98108

Entry Time/Date: 9:00 AM 04/18/07
Exit Time / Date: 11:45 AM 04/18/07
Permit Effective Date:
Permit Expiration Date:

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)
Eric Paul, VP of Operation
SEATTEL IRON AND METAL CORPORATION
601 S. MYRTLE STREET - SEATTLE, WA 98108

Other Facility Data

Name, Address of Responsible Official/Title/Phone and Fax Number.
Eric Paul, VP of Operation
206-682-0040

Phone Number Fax Contacted? ☒ Yes ☐ No

Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

☒	Permit	☐	Flow Measurement	☐	Operations&Maint.	☐	CSO/SSO (Sewer Overflow)
☐	Records/Reports	☐	Self-Monitoring Program	☐	Sludge Handling/Disposal	☒	Pollution Prevention
☒	Facility Site Review	☐	Compliance Schedules	☐	Pretreatment	☐	Multimedia
☐	Effluent/Receiving water	☐	Laboratory	☒	Storm Water	☐	other

Section D. Summary of Findings/Comments

This is an inspection for completing the individual NPDES permit application. SEATTEL IRON AND METAL(SIM) is the only scrap yards this size for cars and other metals in NWRO and considered one of the largest in Washington.

John Drabek and I arrived at the facility at about 9:00 AM and met with Mr. Eric Paul, VP of operation. He walked us through the drawings before we started actual plant visit. SIM uses a metal shredder to break up larger pieces of ferrous and non-ferrous metals into small pieces. The smaller pieces are sold to metal recyclers for further processing. The facility is operating under administrative order that was issued on May 28, 1999 and general permit # SO3003645C. The administrative order has not been rescinded. According to the order, the facility must submit an application for an individual permit and it has done so. The order has asked the SIM for certain monitoring parameters and frequency. The SIM, failed to comply with the order. The reason for failure was when the SIM received its renewed stormwater general permit, it mistakenly thought the new general permit is replacing the older order and that matter was never confirmed or rejected by the department. The SIM was operating under the false notion for sometime. However, the general permit and the order, both, are in effect until a new individual permit is written. This matter was discussed with facility. An individual permit is being written for this facility currently. The site, despite piles of scrap materials, appeared to be in a very good order. The contaminated stormwater collected in an underground storage vault. The treatment plant start operation and treatment when wastewater collected in the vault reaches a certain height. The treated contaminated stormwater are discharged to Duwamish waterways. The system is fully automated and it can also run manually. Besides contaminated stormwater, the facility generates process wastewater is discharged to King County sanitary sewer system. The County's pretreatment program has issued an industrial users permit to the facility under the County's pretreatment program delegated to the County by the State of Washington.

Name(s) and Signatures of Inspector(s)	Agency/Office/Telephone	Date
Ed Abbasi P.E. Hamid Abbasi	WA Dept. of Ecology/NWRO/(425)649-7227 3190 160th SE, Bellevue, WA 98008-5452	5/16/2007
John Drabek P.E.	WA Dept. of Ecology NWRO - (425)649-7227 3190 160th SE, Bellevue, WA 98008-5452	
Signature of Management Q A Reviewer	Agency/Office/Phone and Fax Numbers	Date
	WA Dept. of Ecology/NWRO/(425)649-7000 fax (425)649-7098	5/17/07

UNANNOUNCED Inspection

INSTRUCTIONS

Section A: National Date System Coding (I.e., PCS)

Column 1: Transaction Code. Use N, C, or D for New Change or Delete. All inspections will be new unless there is an error in the data entered.

Columns 3-11: NPDES Permit No. Enter the facility's NPDES permit number. *(Use the Remarks columns to record State permit number, if necessary.)*

Columns 12-17: Inspection Date. Insert the date entry was made into the facility. Use the year/month/day format (e.g., 94/06/30 = June 30, 1994).

Column 18: Inspection Type. Use one of the codes listed below to describe the type of inspection:

A Performance Audit
B Compliance Biomonitoring
C Compliance Evaluation (non-sampling)
D Diagnostic
E Corps of Engineers Inspection
F Pretreatment Follow-up
G Pretreatment Audit
I Industrial User (IU) Inspection
L Enforcement Case Support
M Multimedia
P Pretreatment Compliance Inspection
R Reconnaissance
S Compliance Sampling
U IU Inspection with Pretreatment Audit
X Toxics Inspection
Z Sludge
2 IU Sampling Inspection
3 IU Non-Sampling Inspection
4 IU Toxics Inspection
5 IU Sampling Inspection with Pretreatment
6 IU Non-Sampling Inspection with pretreatment
7 IU Toxics with Pretreatment

Column 19: Inspector Code. Use one of the codes listed below to describe the *lead agency* in the inspection.

C - Contractor or Other Inspectors (*Specify in Remarks Columns*)
E - Corps of Engineers
J - Joint EPA/State Inspectors - EPA Lead
N - NEIC Inspectors
R - EPA Regional Inspector
S - State Inspector
T - Joint State/EPA Inspectors - State Lead

Column 20: Facility Type. Use of one of the codes below to describe the facility.

1 - Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.
2 - Industrial. Other than municipal, agricultural, and Federal facilities.
3 - Agricultural. Facilities classified with 1987 SIC 0111 to 0971.
4 - Federal. Facilities identified as Federal by the EPA Regional Office

Columns 21-66: Remarks. These columns are reserved for remarks at the discretion of the Region.

Columns 67-69: Inspection Work Days. Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, and remote sensing; and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation.

Column 70: Facility Evaluation Rating. Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

Column 71: Biomonitoring Information. Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

Column 72: Quality Assurance Data Inspection. Enter Q if the inspection was conducted as follow-up on quality assurance sample results. Enter N otherwise.

Columns 73-80: These columns are reserved for regionally defined information.

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This section is self-explanatory except for "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, and other updates to the record).

Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. Use the headings given on the report form (e.g., Permit, Records/Reports) when discussing the areas evaluated during the inspection. The heading marked "Multimedia" may indicate medias such as CAA, RCRA, and TSCA. The heading marked "Other" may indicate activities such as SPCC, BMPs, and concerns that are not covered elsewhere.

Section D: Summary of Findings/Comments

Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.

PHOTO NO. 1

DESCRIPTION:

THE contaminated stormwater treatment system. The treatment system is DAF system.

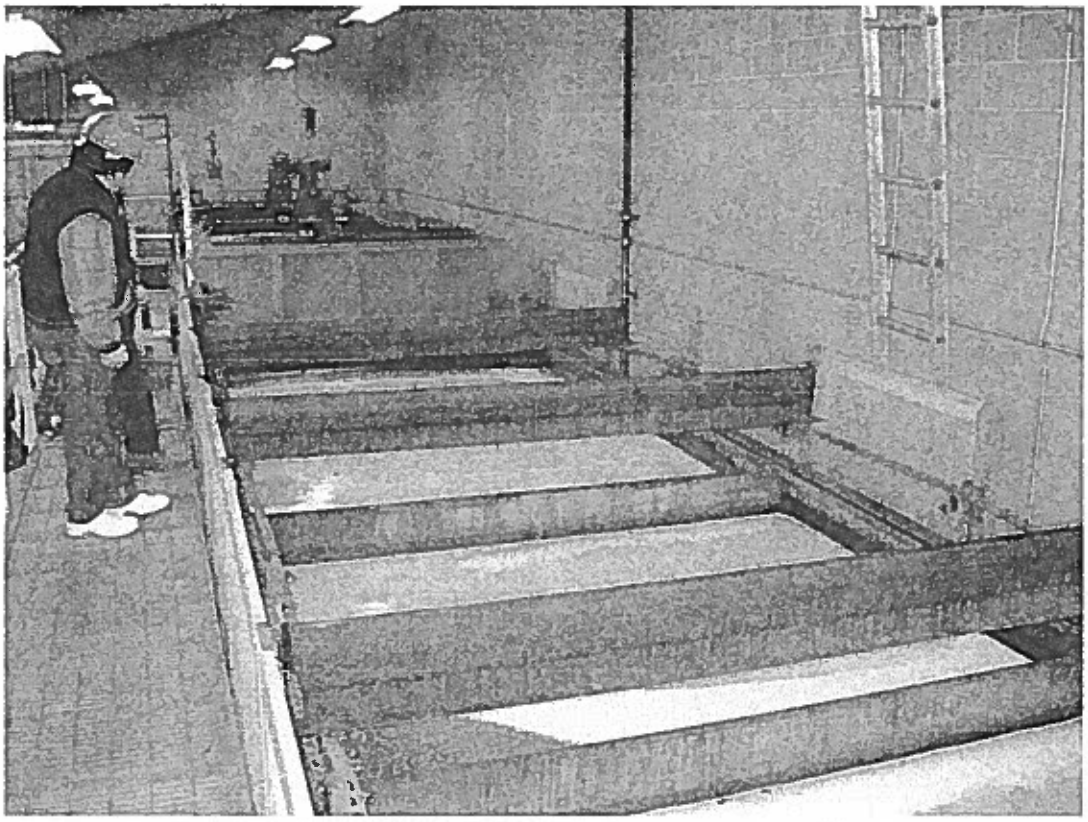


PHOTO NO. 2

DESCRIPTION:

Shredded piles of materials that is being taken for further separation.

PHOTO NO. 3

DESCRIPTION:

Mixed scraps are being prepared for separation.

PHOTO NO. 4

DESCRIPTION:

More mixed scraps are being prepared for separation.

PHOTO NO. 5

DESCRIPTION:

The Copper scarps are being prepared for shipment to recyclers.

PHOTO NO. 6

DESCRIPTION:

More mixed scraps are being prepared for separation.

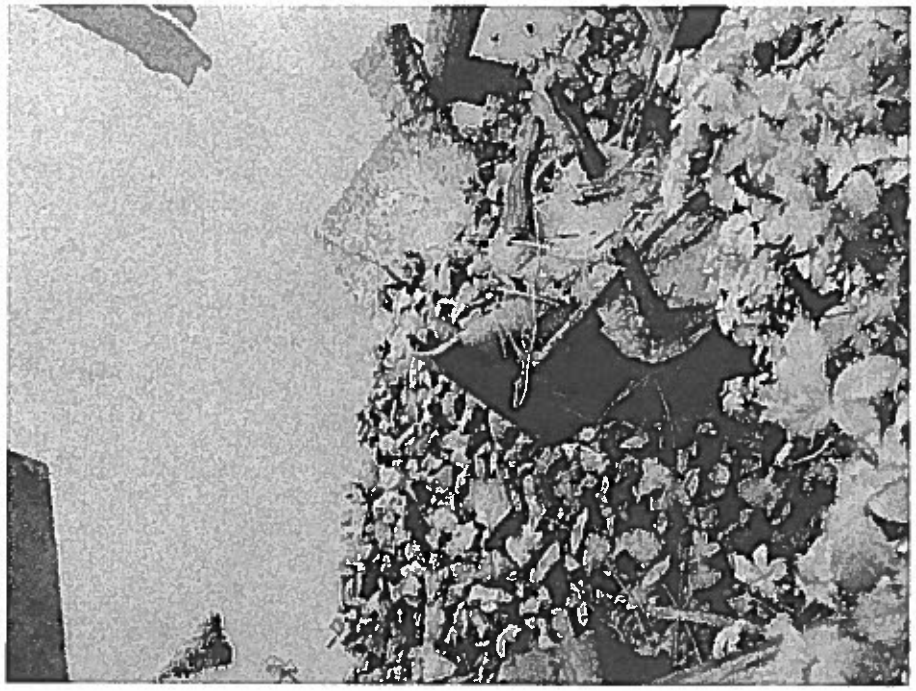


PHOTO NO. 7 FACILITY: Seattle Iron and Metal
DATE: 04/18/07 TAKEN BY: John Drabek
DESCRIPTION: View of the exposed outfall to Duwamish waterways. The outfall maybe submerged depending on tides.

PHOTO NO. 8 FACILITY: Seattle Iron and Metal
DATE: 04/18/07 TAKEN BY: John Drabek
DESCRIPTION: View of the exposed outfall to Duwamish waterways. The outfall maybe submerged depending on tides.

State of Washington Department of Ecology
Northwest Regional Office

STORMWATER COMPLIANCE INSPECTION REPORT

General Data

Inspection Date	NPDES Permit #	County	Receiving Waters	Inspector(s)	Fac Type
03/29/06	SO3003645C	King	Duwamish Waterway	Greg Stegman	Industrial

Weather at time of inspection: Clear

Discharges to: Surface Water ☒ Ground Water ☐ Discharge location: N 47 32' 21.8"; W 122 19' 31.5" (NAD83)

Facility Data

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Seattle Iron and Metal Corporation 601 S Myrtle St. Seattle, WA 98108 Facility entrance location: N 47 32' 16.5"; W 122 19' 36.5" (NAD83)	10:00 am	09/20/02
	Exit Time 11:50 am	Permit Expiration Date 09/20/07

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)	Additional Participants:
Eric Paul 206-682-0040	Megan Wisdom, Ecology

Mailing Address of Responsible Official/Title/Phone and Fax Number.	
Eric Paul Seattle Iron and Metal Corporation 601 S Myrtle St. Seattle, WA 98108	Samples Taken? No Photos Taken? Yes
Phone number (206) 682-0040 Announced Inspection	

CONCERNS AND RECOMMENDATIONS

- The Administrative Order (Order) issued to Seattle Iron and Metal Corporation has not been rescinded. Contact John Drabeck (425) 649-7293 with any questions regarding compliance with the Order and individual permit application process.
- The total zinc value for the second quarter of 2005 has exceeded the benchmark value described in Industrial Stormwater General Permit (permit) condition S4.D.2, therefore consult permit condition S4.C for the appropriate response.
- There were petroleum stains around the stationary fueling station. To prevent petroleum contamination of stormwater, implement the necessary fueling station operational and/or source control Best Management Practices (BMPs).

For assistance with any of these compliance issues or recommendation regarding BMPs see the Stormwater Management Manual for Western Washington, volumes IV and V (SWMM). To obtain a copy of the SWMM you may go to Ecology's website at: http://www.ecy.wa.gov/programs/wq/stormwater/manual.html

BACKGROUND
Seattle Iron and Metals Corporation (SIMC) uses a metal shredder, a shearing machine and torches to break up larger pieces of ferrous and non-ferrous metals into small bits that are then sold to recyclers. On May 28, 1999 an Administrative Order (Order) was issued to SIMC and remains in effect. The Order required SIMC to apply for an Individual State Waste Discharge Permit (individual permit), which they have done. In addition, the Order requires monitoring of the facility's stormwater discharges. The individual permit application is being processed by John Drabeck of Ecology. Seattle Iron and Metal is still required to comply with all terms of the Order, until the issuance of the individual permit. The facility also is covered by an Industrial Stormwater General Permit (general permit). The general permit will remain in effect until the individual permit is issued. The Department of Ecology (Ecology) has conducted an inspection at this facility in the past. The purpose of this inspection is to respond to a complaint and to conduct a compliance inspection per the requirement of the Revised Code of Washington (RCW) 90.48.560. The complaint concerned pictures, that Ecology received on February 17 2006, showing scrap metal from the SIMC site spilling down the bank towards the Duwamish Waterway. Eric Paul, representing SIMC, affirmed that the picture was at his facility and told us that they had cleaned up the area using a giant magnet and installed an additional barrier in the area to prevent future material overflow (photo P3290013).

Areas Evaluated During Inspection		
Stormwater Pollution Prevention Plan (SWPPP)	☒	Onsite: Yes
Permit	☒	Onsite: Yes
Visual Inspections	☒	Documented: Yes
Spill prevention and emergency cleanup plan	☒	Documented: Yes
Employee training for spill plan and SWPPP	☒	Documented: Yes
Discharge Monitoring Reports (DMRs)	☒	DMR concern(s): Parameter(s) above permit limit
Catch Basins	☒	Frequency of Cleaning: As needed Catch basin filters are changed as needed.
Oil/Water Separators	☐	Frequency of Cleaning: Unknown
Equipment/Vehicle Washing	☒	Conducted onsite: Yes Wash water drains to:Sanitary sewer
Outside Storage and Parking Areas	☒	Paved: Yes Sweeping Frequency: Daily Type of materials stored outside: See below Type of vehicles stored outside: Heavy equipment Stockpiles of scrap metal (photo P3290006) are located through out the site in various states of processing. Most stockpiles are uncovered and sorted by metal type. The facility does not take hazardous materials. Some potentially hazardous liquids are present in the junked cars, and are burned during the shredding process.
Fueling operations	☒	Conducted onsite: Yes Type: Stationary There were petroleum stains around the stationary fueling station.
Equipment/Vehicle Maintenance	☒	Conducted onsite: Yes Repair and maintenance performed outside: No
Treatment System, monitoring point and discharge point	☒	All stormwater on site is moved through a carefully designed and managed treatment system. The treatment system consists of flocculation and metal precipitation. Stormwater sampling is conducted at a spigot (Photo P3290016) tapped into the treatment plant's effluent pipe. Effluent from the treatment plant is then discharged into the Duwamish Waterway. Sampling is not

		conducted at the Duwamish Waterway outfall because the discharge at this point is a mixture of off site stormwater from Orchard Street and the treated stormwater from the facility.

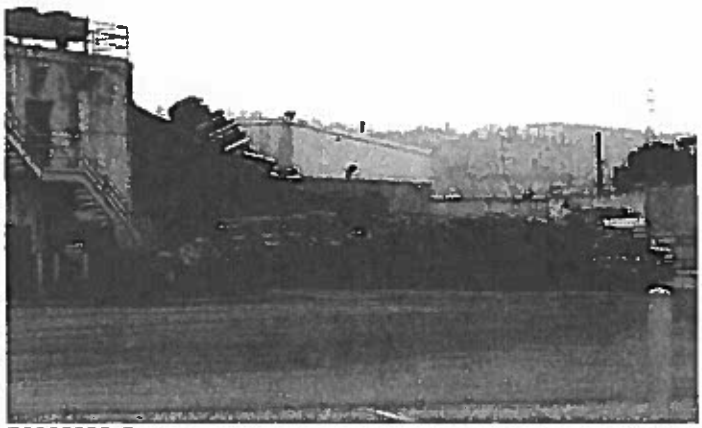
For questions concerning this inspection report please contact Greg Stegman at (425)-649-7019, gste461@ecy.wa.gov or Washington State Department of Ecology, NWRO, 3190 160th Avenue SE, Bellevue, WA 98008-5452.

cc: Greg Stegman, Ecology

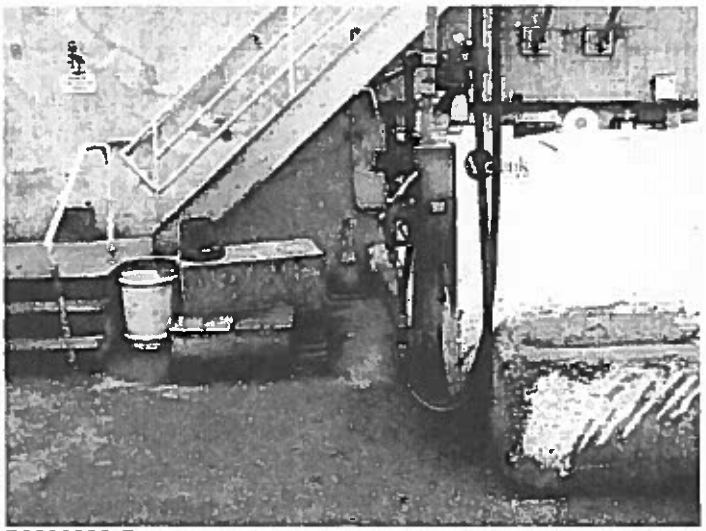
Signatures

Gregory P. Stegman 062306	Reviewed and approved by: 6/23/06
Gregory P. Stegman Stormwater Inspector Water Quality Program	Donald Seeberger Unit Supervisor Water Quality Program
Date	Date

PHOTO ADDENDUM – SEATTLE IRON AND METAL CORPORATION 3/29/06

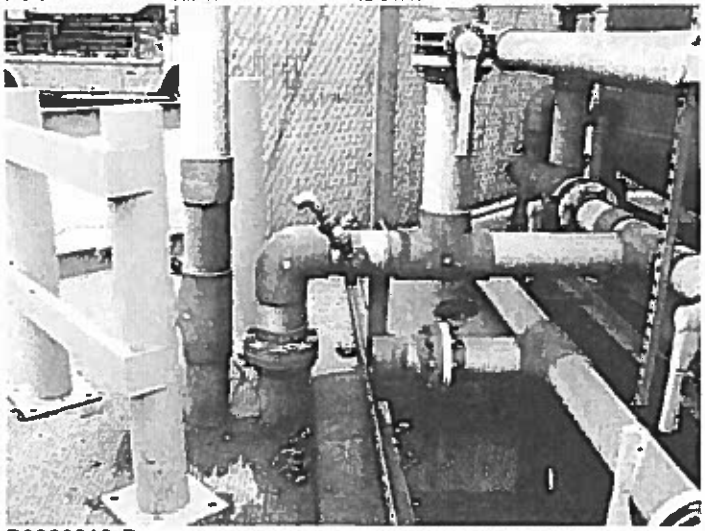


P3290006 DESCRIPTION: STOCKPILED MATERIAL NEAR SHREDDER



P3290009 DESCRIPTION: DIESEL FUEL STATION

P3290013 DESCRIPTION: RECENTLY INSTALLED SECONDARY CONTAINMENT AT SOUTHERN EDGE OF PROPERTY



P3290016 DESCRIPTION: SAMPLE POINT- WHERE TREATMENT SYSTEM DISCHARGES TO PIPE THAT EVENTUALLY DISCHARGES TO DUWAMISH.

State of Washington Department of Ecology
Northwest Regional Office

WATER COMPLIANCE INSPECTION REPORT

substitute for OMB No. 2040-0057 and EPA form 3560-3 (Rev. 9-94) (last file update 12-95.)

Section A: National Data System Coding (i.e., PCS)

Transaction Code	NPDES #	yr/mo/day	Inspection Type	Inspector	Fac Type
1 N 2 5	3 SO3003645 11	12 13/04/0○ 17	18 C	19 S	20 2

Remarks

Inspection work days	Facility Self-Monitoring Evaluation Rating	BI	QA	Reserved
67 ___ 69	70 5	71 N	72 N	73 ___ 74 75 _____ 80

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*	Entry Time/Date	Permit Effective Date
Seattle Iron and Metals 601 S. Garden (Myrtle) Seattle, WA	1:45 AM 04/13/00	6-4-99
	Exit Time / Date 3:20 AM 04/13/00	Permit Expiration Date 11/18/00

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)	Other Facility Data
Eric R. Paul, Assistant Vice President of Operations 206-834-4441 fax: 206-623-1231 epaul@seairon.com	
Name, Address of Responsible Official/Title/Phone and Fax Number. Phone Number Fax Contacted? ☐ Yes ☐ No	

Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

☒	Permit	☐	Flow Measurement	☐	Operations&Maint.	☐	CSO/SSO (Sewer Overflow)
☐	Records/Reports	☒	Self-Monitoring Program	☐	Sludge Handling/Disposal	☒	Pollution Prevention
☐	Facility Site Review	☐	Compliance Schedules	☐	Pretreatment	☐	Multimedia
☐	Effluent/Receiving water	☐	Laboratory	☒	Storm Water	☐	other

Section D: Summary of Findings/Comments

The business moved from Harbor Island to this site which was designed for the operation. The stormwater (up to the design capacity) is collected on site and conveyed to a stormwater treatment system. That system is still being brought on line and has not achieved satisfactory performance yet. More rain will provide opportunities to continue to tune up the system. Potential discharges must meet effluent limits. Effluent that does not meet water quality standards may not be discharged to the river. In theory, it could be discharged back to the retention and detention system and reprocessed. We recommended that the company also determine whether METRO/King County would take off spec discharges to the sanitary sewer. The discharge from the treatment train will easily meet pretreatment requirements.

We suggested that on site wash down could be done with either treated or stored stormwater. It would be a conservation measure. The washdown water in the vicinity of the shredder may not be discharged to the stormwater collection system. The discharge of process water should be to the sanitary sewer. This should also be discussed with sewer staff.

The move was done with increasing urgency. Significant penalties were possible if the move were delayed. Because of the rush, the site was not organized as well as it should be. Some of the scrap metal is stored too close to the river's edge. It is important to pull the materials back away from the edge of the site. The stormwater pollution prevention plan has not been fully implemented. Oil spills need to be cleaned up promptly. Small areas where asphalt has been damaged should be repaired. Asphalt may be an inappropriate material for use in the working area. Fuel tanks although contained, were not stored under cover. Some of the equipment under repair seemed to also be located too close to the edge of the site. The need to relocate from one site to another has created problems that would not exist if the business has simply begun operations at the new location.

Additional stormwater protection is necessary. We requested that the company assess the structural, operational and housekeeping deficiencies and prioritize actions with target dates for compliance. Topping the list would be to have the treatment system operating at design efficiency and producing an effluent that meets water quality standards at the end of the system.

A copy of the Stormwater Pollution Prevention Plan (SWPPP) should also be sent to Ecology. The Pollution Control Officer needs to make sure that the plan is fully implemented. Corrections should be made as soon as possible. Generally, compliance with the SWPPP should take precedence over routine business.

Name(s) and Signatures of Inspector(s)	Agency/Office/Telephone	Date
Ron Devitt	WA Dept. of Ecology/NWRO/425-649-7028 3190 160th Ave SE, Bellevue, WA 98008-5452	04/18/00
John Drabek		
Signature of Management Q A Reviewer	Agency/Office/Phone and Fax Numbers	Date
	WA Dept. of Ecology/NWRO/(425)649-7000 fax 425-649-7098	4/18/00

UNANNOUNCED Inspection

INSTRUCTIONS

Section A: National Date System Coding (i.e., PCS)

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- A Performance Audit
- B Compliance Biomonitoring
- C Compliance Evaluation (non-sampling)
- D Diagnostic
- E Corps of Engineers Inspection
- F Pretreatment Follow-up
- G Pretreatment Audit
- I Industrial User (IU) Inspection
- L Enforcement Case Support
- M Multimedia
- P Pretreatment Compliance Inspection
- R Reconnaissance
- S Compliance Sampling
- U IU Inspection with Pretreatment Audit
- X Toxics Inspection
- Z Sludge
- 2 IU Sampling Inspection
- 3 IU Non-Sampling Inspection
- 4 IU Toxics Inspection
- 5 IU Sampling Inspection with Pretreatment
- 6 IU Non-Sampling Inspection with pretreatment
- 7 IU Toxics with Pretreatment

Column 19: Inspector Code. Use one of the codes listed below to describe the *lead agency* in the inspection.

- C - Contractor or Other Inspectors (*Specify in Remarks Columns*)
- E - Corps of Engineers
- J - Joint EPA/State Inspectors - EPA Lead
- N - NEIC Inspectors
- R - EPA Regional Inspector
- S - State Inspector
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Column 20: Facility Type. Use of one of the codes below to describe the facility.

1 - Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.
2 - Industrial. Other than municipal, agricultural, and Federal facilities.
3 - Agricultural. Facilities classified with 1987 SIC 0111 to 0971.
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Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.

FACILITY: Seattle Iron and Metals (SO3003645) DATE: 4/13/00 TAKEN BY: Ron Devitt

PHOTO NO. 1

DESCRIPTION:

Stormwater treatment system westerly components

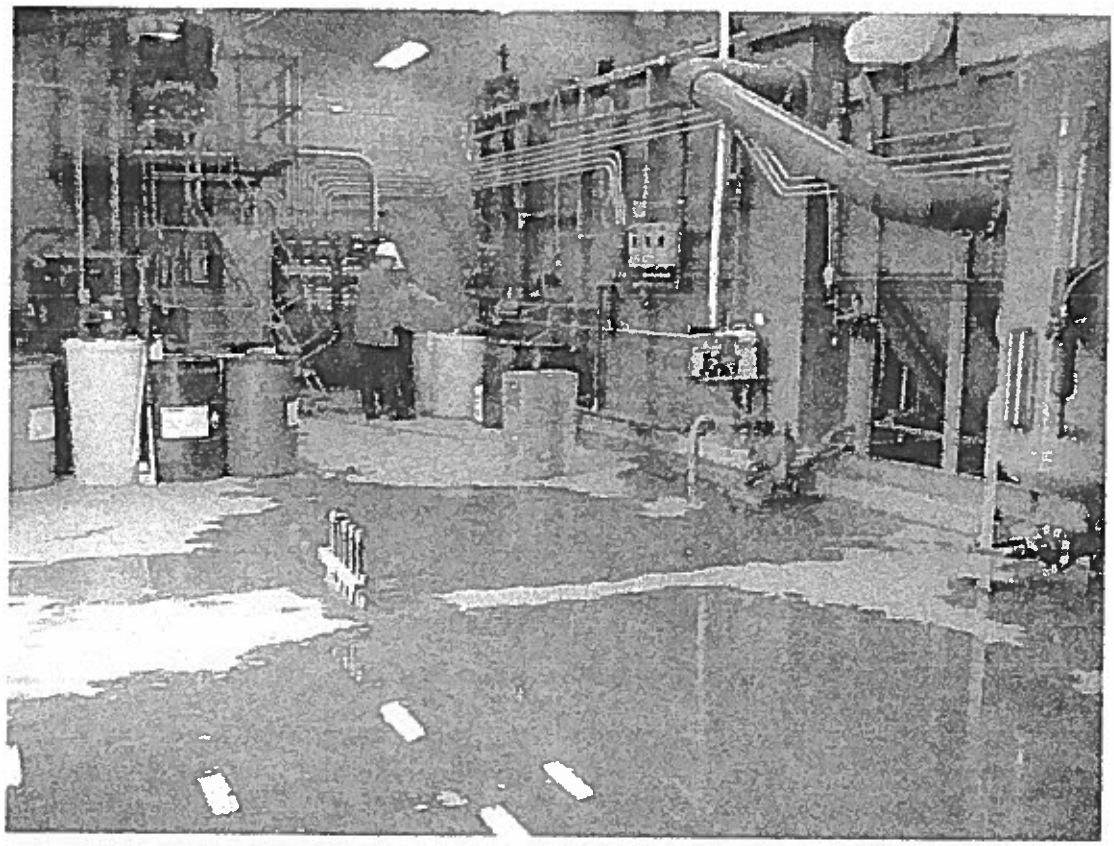
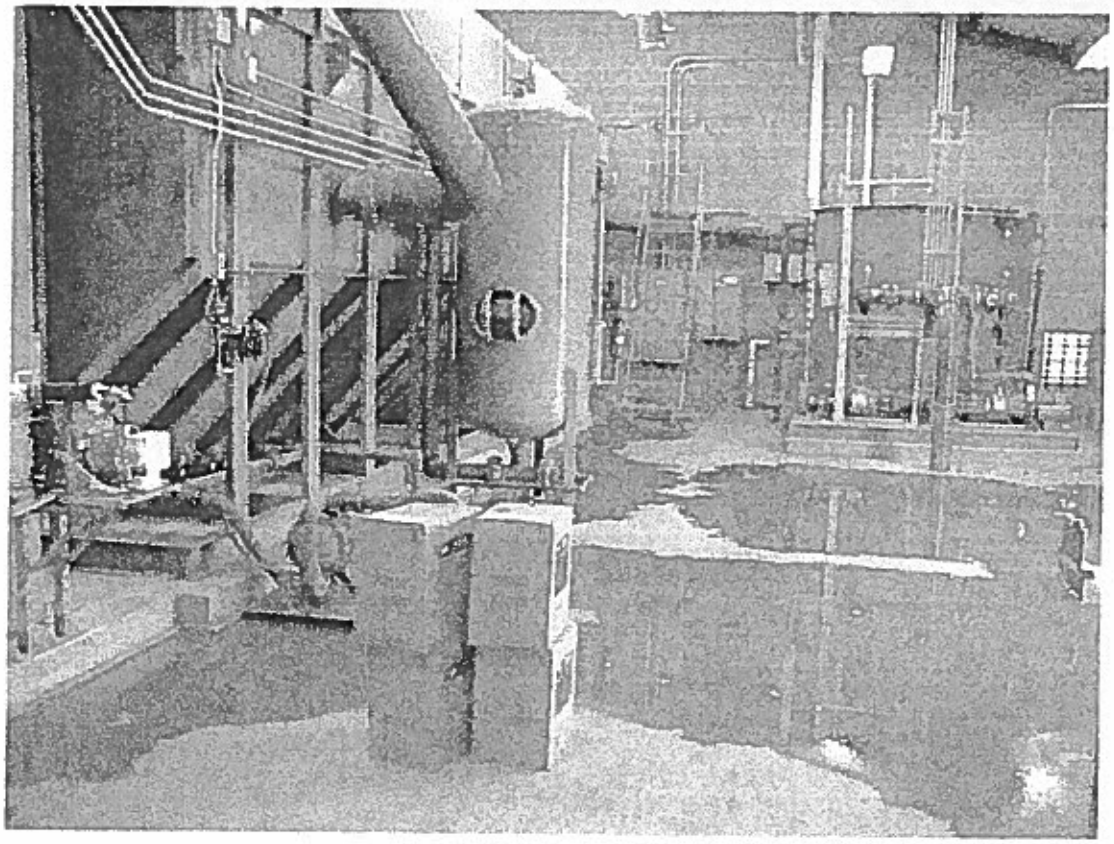


PHOTO NO. 2

DESCRIPTION:
Stormwater treatment components easterly components—Multimedia filters outside the building



FACILITY: Seattle Iron and Metals (SO3003645) DATE: 4/13/00 TAKEN BY: Ron Devitt

PHOTO NO. 3

DESCRIPTION:

Metal turnings area in a shed with strip drain at threshold to capture oil

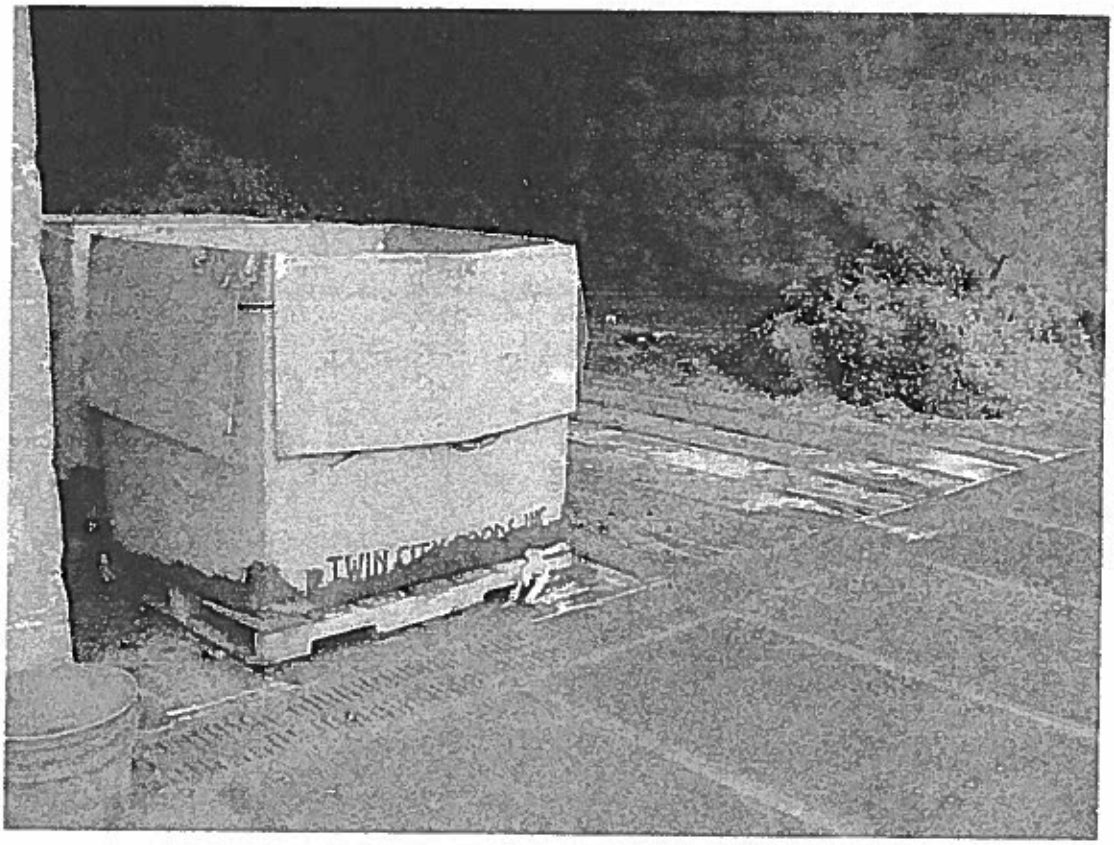
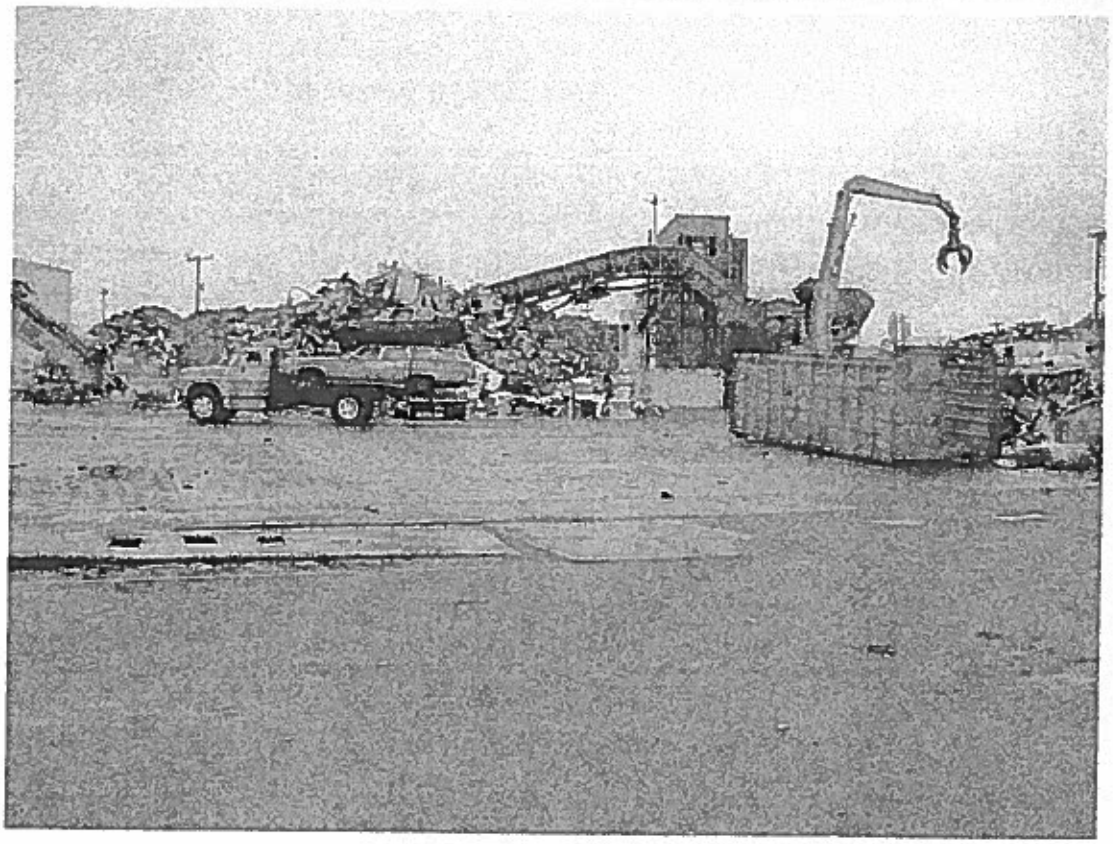


PHOTO NO. 4

DESCRIPTION:
View toward operation from near the river's edge



FACILITY: Seattle Iron and Metals (SO3003645) DATE: 4/13/00 TAKEN BY: Ron Devitt

PHOTO NO. 5

DESCRIPTION:
Scrap materials stored too close to river

PHOTO NO. 6

DESCRIPTION:
View from off site to fuel tank and equipment close to water

State of Washington Department of Ecology
Northwest Regional Office

WATER COMPLIANCE INSPECTION REPORT

substitute for OMB No. 2040-0057 and EPA form 3560-3 (Rev. 9-94) (last file update 12-95.)

Section A: National Data System Coding (i.e., PCS)

Transaction Code	NPDES #	yr/mo/day	Inspection Type	Inspector	Fac Type
1 N 2 5	3 WA-003196-8 11	12 13/07/12 17	18 R	19 S	20 2

Remarks

Inspection work days	Facility Self-Monitoring Evaluation Rating	BI	QA	Reserved
67 0.2 69	70 2	71 N	72 N	73 ____ 74 75 _____ 80

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*	Entry Time/Date	Permit Effective Date
SEATTEL IRON AND METAL CORPORATION 601 S. MYRTLE STREET SEATTLE, WA 98108	1:00 PM 12/13/07	12/01/07
	Exit Time / Date 3:00 PM 12/13/07	Permit Expiration Date 10/25/07

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)
Eric Paul, VP of Operation
SEATTEL IRON AND METAL CORPORATION
601 S. MYRTLE STREET - SEATTLE, WA 98108

Name, Address of Responsible Official/Title/Phone and Fax Number.
Eric Paul, VP of Operation
206-682-0040

Phone Number Fax Contacted? ☒ Yes ☐ No

Other Facility Data

Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

☒	Permit	☐	Flow Measurement	☒	Operations & Maint.	☐	CSO/SSO (Sewer Overflow)
☐	Records/Reports	☐	Self-Monitoring Program	☐	Sludge Handling/Disposal	☒	Pollution Prevention
☒	Facility Site Review	☐	Compliance Schedules	☐	Pretreatment	☐	Multimedia
☒	Effluent/Receiving water	☐	Laboratory	☒	Storm Water	☐	other

Section D: Summary of Findings/Comments

This was a reconnaissance inspection. SEATTEL IRON AND METAL(SIM) is the only scrap yard this size for cars and other metals in NWRO and considered one of the largest in Washington.

Robert Wright and Mike Jeffers of Ecology and I arrived at the facility at about 1.00 PM and met with Mr. Eric Paul, VP of Operation. We discussed that the purpose of our visit ~~that~~ was to familiarize Robert Wright and Mike Jeffers with the site as part of their Duwamish Urban Waters Source Control Initiative in support of the Superfund Clean-up of the river. Mr. Paul walked us through the drawings before we started the actual site visit. SIM uses a metal shredder to break up larger pieces of ferrous and non-ferrous metals into smaller pieces. The smaller pieces are sold to metal recyclers for further processing. Other non-metals and non-recycleable materials, such as foams and some plastics are landfilled. The facility had been operating under administrative order that was issued on May 28, 1999 and general permit # SO3003645C. A new permit was issued in November 2007 that became effective on December 1st. The site appeared to have excessive stockpiles ~~amount~~ of recyclable materials that needed be removed as soon as possible. The site appeared to have been pushed to its limits. The stormwater on site appeared to be extremely contaminated and viscous. ~~We did not notice any applicable~~ The implementation of pollution source control measures on the site were very limited. Adequate catch basins inlet protection was missing ~~specially, the.~~ They appeared to be filled with extremely dirty/oily runoffs. Failure to properly control the pollution at its source would likely jeopardize the efficiency of the stormwater treatment system ~~units.~~ We noticed oily stormwater ~~runoffs running~~ on the dock that may flow to the river instead of the treatment system.~~into the Duwamish.~~ The facility was originally designed to collect the contaminated stormwater in an underground storage vault. The vault was designed based on 5 year- 24hr. Runoff as a result of storms larger than the design storm is discharged directly to the river. The treatment plant starts operation and treatment when wastewater collected in the vault reaches a certain height and activates a float switch. The treated contaminated stormwater is discharged to Duwamish River. The system is fully automated and it can also run manually. Besides contaminated stormwater, the facility generates some process wastewater which is discharged to King County sanitary sewer system. The County's pretreatment program has issued an industrial users permit to the facility under the County's delegated pretreatment program.

Name(s) and Signatures of Inspector(s)	Agency/Office/Telephone	Date
Ed Abbasi P.E.	WA Dept. of Ecology/NWRO/(425)649-7227 3190 160th SE, Bellevue, WA 98008-5452	6/5/2009
Robert Wright	WA Dept. of Ecology NWRO - (425)649-7227 3190 160th SE, Bellevue, WA 98008-5452	

Signature of Management Q A Reviewer	Agency/Office/Phone and Fax Numbers WA Dept. of Ecology/NWRO/(425)649-7000 fax (425)649-7098	Date

ANNOUNCED Inspection

Appendix E Compliance Inspection Report Form

INSTRUCTIONS

Section A: National Data System Coding (i.e., PCS)

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B Compliance Biomonitoring
C Compliance Evaluation (non-sampling)
D Diagnostic
E Corps of Engineers Inspection
F Pretreatment Follow-up
G Pretreatment Audit
I Industrial User (IU) Inspection
L Enforcement Case Support
M Multimedia
P Pretreatment Compliance Inspection
R Reconnaissance
S Compliance Sampling
U IU Inspection with Pretreatment Audit
X Toxics Inspection
Z Sludge
2 IU Sampling Inspection
3 IU Non-Sampling Inspection
4 IU Toxics Inspection
5 IU Sampling Inspection with Pretreatment
6 IU Non-Sampling Inspection with pretreatment
7 IU Toxics with Pretreatment

Column 19: Inspector Code. Use one of the codes listed below to describe the *lead agency* in the inspection.
C - Contractor or Other Inspectors (*Specify in Remarks Columns*)
E - Corps of Engineers
J - Joint EPA/State Inspectors - EPA Lead
N - NEIC Inspectors
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Column 20: Facility Type. Use of one of the codes below to describe the facility.
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4 - Federal. Facilities identified as Federal by the EPA Regional Office

Columns 21-66: Remarks. These columns are reserved for remarks at the discretion of the Region.

Columns 67-69: Inspection Work Days. Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, and remote sensing; and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation.

Column 70: Facility Evaluation Rating. Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

Column 71: Biomonitoring Information. Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

Column 72: Quality Assurance Data Inspection. Enter Q if the inspection was conducted as follow-up on quality assurance sample results. Enter N otherwise.

Columns 73-80: These columns are reserved for regionally defined information.

Section B: Facility Data

This section is self-explanatory except for "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, and other updates to the record).

Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. Use the headings given on the report form (e.g., Permit, Records/Reports) when discussing the areas evaluated during the inspection. The heading marked "Multimedia" may indicate medias such as CAA, RCRA, and TSCA. The heading marked "Other" may indicate activities such as SPCC, BMPs, and concerns that are not covered elsewhere.

Section D: Summary of Findings/Comments

Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.

Field Notes on Investigation of white discharge at Seattle Iron & Metal
7-22-08

Received ERTS complaint #607150 on 7-21-08 regarding a white foamy discharge to the Duwamish River at Seattle Iron & Metal (SIM) that was taking place (approx 3 pm). The complaint was referred to Seattle Public Utilities (SPU). I talked with Brian Robinson from SPU at about 4:30 and he volunteered to contact the complainant to get more information.

I made arrangements to meet with Brian (SPU) at SIM on S. Myrtle Street at 10:30 on Tuesday July 22. I contacted Eric Paul, Assistant V.P. of Operations upon our arrival and explained that we would need access to SIM to investigate the complaint. He said that SIM had a discharge to the river from their treatment plant on the day in question. We meet with Mr. Paul and looked at site drainage maps and discussed the treatment plant discharge. We showed Mr. Paul the photos taken by the complainant from the river the day of the discharge.

Mr. Paul got the plant operator to join the meeting and answer our questions. Apparently he started up the treatment system around 2:30 pm to draw down the vault and gain capacity. The system was run for about 2 hours and discharged approximately 20,000 gallons.

I requested that SIM submit an incident report to Ecology (Ed Abbasi) that addressed the treatment operation and discharge. (why was the operation started when there has been no rain for 2 ½ weeks, how much was treated, by who, what was the quality of the effluent, were samples collected, was the operation "normal", what could have caused the excessive foaming at the river, what specific chemical additives went into the process on the 21st, was the strong sulfur order in the treatment plant normal and any other information that would be pertinent.

We then went to the treatment plant and there was a very strong rotten egg odor in the building. The floor drains had some white residue around them. The DAF tanks were in circulation mode and not discharging. Mr. Paul assured me that the floor drains in the treatment plant building went to the sanitary sewer.

We then looked at the sand filters and followed the discharge line to the point where it joins the city storm drain system from S. Garden Street. We looked at the discharge pipe to the river with the rubber flapper gate. The dock area was in need of source control. I saw maintenance being performed on a large dump truck on the dock. I would consider it a permit violation to conduct or perform heavy equipment maintenance on the either one of the docks.

Issues and Recommendations:

SIM must submit a written incident report to Ecology with all pertinent information pertaining to the start up, operation and discharge of the treatment system on the afternoon of July 21, within 5 days.

The site drainage map must be reviewed, verified and updated as necessary. The floor drains in the treatment plant building must be included. As-builts for the vault, effluent line and overflow lines must be also included.

Maintenance activity was observed on a large dump truck on the dock. The truck was leaking fluid or fluid was spilled during maintenance. Equipment and vehicle maintenance should be prohibited from the docks

All stormwater hitting either dock must be collected and routed to the on-site system. To allow any stormwater to flow to the river from either dock is a violation and must be prevented.

SIM should notify Ecology prior to the next treatment plant start up and discharge to allow Ecology an opportunity to be present, observe the discharge and split samples with SIM.

Track out of oil and metal particulates onto S. Myrtle Street could be seen. This loading will flow to the Duwamish River via the city storm drain system that outfalls on the riverbank at the west end of S. Myrtle. SIM must do a better job of minimizing track out all and entrance/exits at the facility. Monitoring of the city storm storm drain system down stream of SIM should be considered/required.

Maintenance logs of all storm drain system maintenance must be kept on site.